

ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE IN LAKEWOOD, OHIO

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I. INTRODUCTION

Fair housing laws exist to counteract the effects of housing discrimination and to protect the right of all people to choose where to live without regard to certain protected characteristics. Housing discrimination is prohibited under the federal Fair Housing Act (42 U.S.C. Section 3601, et seq.) based on race, religion, color, sex, national origin, familial status, and disability. Ohio law (O.C.R. Section 4112.02 (H)) prohibits housing discrimination based on all of these protected classes, as well as ancestry and military status.

This report aims to meet the provisions outlined in Section 808(e)(5) of the Fair Housing Act, which requires the Secretary of the Department of Housing and Urban Development (HUD) to administer programs in a manner that affirmatively furthers fair housing. State and local governments that receive community development funding from HUD through the Community Development Block Grant (CDBG) program are required to certify that they affirmatively further fair housing in their usage of those funds.¹ In addition, recipients of HOME Investment Partnership (HOME) funding must also affirmatively further fair housing and document their actions to address identified impediments to HUD.² As a recipient of CDBG funding, the City of Lakewood must certify that it affirmatively furthers HUD's fair housing goals.

To fulfill its fair housing obligation, HUD requires a grantee to:

1. Conduct an Analysis of Impediments to Fair Housing Choice (AI) within the jurisdiction, with a recommendation that the AI be updated "at least once every 3 to 5 years;"
2. Take appropriate actions to overcome the effects of any impediments identified through the analysis, including developing lists of "specific actions...to be undertaken" including "milestones, timetables, and measurable results;" and
3. Maintain records reflecting the analysis, including the AI, and actions taken to eliminate identified impediments.³

Although the AI itself is not submitted to HUD, local jurisdictions are required to provide HUD with a summary of the AI, in addition to the jurisdiction's accomplishments for the past year, as part of its annual performance report under the Consolidated Plan regulations.⁴ An Analysis of Impediments to Fair Housing Choice reviews barriers to fair housing choice in both the public and private sectors. Impediments to fair housing are defined as:

1. Any actions, omissions, or decisions taken because of race, color, national origin, religion, family status, disability, or sex which restrict housing choice or the availability of housing choices; or

¹ 42 U.S.C. § 5304(b)(2)

² The United States Department of Housing and Urban Development (HUD), *Fair Housing Planning Guide*, Vol. 1, p.1-2.

³ 24 C.F.R. §91.425 (a)(1)(i); 24 C.F.R. §570.601(a)(2); and HUD, *Fair Housing Planning Guide*, Vol. 1, p. 1-2 to 1-3 and 2-5 to 2-6.

⁴ HUD, *Fair Housing Planning Guide*, Vol. 1, p.2-7, citing 24 C.F.R. §91.520(a). HUD does note that it "could request submission of the AI in the event of a complaint or as part of route monitoring." *Id.*

2. Any actions, omissions, or decisions which have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, national origin, religion, family status, disability, or sex.⁵

While AIs may address affordable housing issues, the HUD Planning Guide notes that the AI should have a “fair housing perspective” and that, while related, affordable housing activities are not the same as fair housing activities.⁶

This Analysis was completed by the Fair Housing Center for Rights & Research for the City of Lakewood. The Fair Housing Center for Rights & Research (The Fair Housing Center) is a private, not-for-profit, fair housing agency whose mission is to protect fair housing rights, eliminate housing discrimination, and promote integrated communities. The Fair Housing Center works to achieve its mission through work in three primary areas: research and mapping; education and outreach; and enforcement of fair housing laws through advocacy, testing, complaint investigation and resolution, and litigation.

⁵ HUD, *Fair Housing Planning Guide*, Vol. 1, p.2-7 to 2-8.

⁶ HUD, *Fair Housing Planning Guide*, Vol. 1, p. 5-4.

II. METHODOLOGY

Information for this report was collected through a variety of methods, including in-person and telephone interviews and collection of other primary data from a number of resources.

Demographic information used in this report was obtained from the United States Census, the American Community Survey, and A Picture of Subsidized Households, a dataset provided by HUD's Office of Policy Development & Research. Information that is not provided in the decennial Census was used from the American Community Survey estimates. Additionally, because the U.S. Census has changed data collection methodologies from year to year, there is data that cannot be compared over time. In this case, the most recent data is displayed. Additional demographic information was provided by the United States Department of Housing and Urban Development, the Ohio Department of Education, and the Cuyahoga Metropolitan Housing Authority.

Mortgage lending data was compiled by The Fair Housing Center using the CRA Wiz software. The data is 2015 and 2016 data, which is the most recent HMDA data available. Foreclosure data was obtained from the Northeast Ohio Community and Neighborhood Data for Organizing at the Center on Urban Poverty and Community Development at Case Western Reserve University and from the Western Reserve Land Conservancy.

Data on fair housing complaints was obtained from the U.S. Department of Housing and Urban Development (HUD).

Testing data was compiled by The Fair Housing Center. This testing was performed by The Fair Housing Center under contracts with the City of Lakewood. Since 2005, the City of Lakewood has contracted with The Fair Housing Center to conduct rental and sales testing.

The Fair Housing Center contacted key stakeholders in the City of Lakewood and Cuyahoga County to obtain their perspectives on possible impediments to fair housing in the City of Lakewood. Interviews were conducted either via phone or in person and lasted approximately 30 to 45 minutes. Questions were open-ended. In total, The Fair Housing Center staff interviewed 10 individuals.

III. EVALUATIONS OF LAKEWOOD'S FAIR HOUSING PROCESS

A. Previous Impediments Identified

The City of Lakewood's previous AI was completed in 2011 by PLANNING/COMMUNICATIONS, who noted 12 potential impediments to fair housing:

1. The Cleveland region's dual housing market, one for Caucasians and one for people of color, distorts the free housing market in Lakewood.
2. Greater information is needed regarding racial steering in Lakewood's real estate industry.
3. Necessity of expanding housing choice to create a free and unitary housing market to prevent segregation in Lakewood neighborhoods.
4. The Cleveland region's dual housing market maintains the rigid racial segregation present in the Cleveland region, which makes it more difficult for individual cities (like Lakewood) to achieve long-term stable racial integration.
5. Lack of real estate agents and rental offices with agents that are people of color.
6. Real estate and rental ads and brochures depict residents of only one race or ethnicity, sending a message of who is welcome or not welcome to live in the advertised housing.
7. One in ten rental ads in Lakewood specify no Section 8 vouchers, which has a disproportionate effect on African Americans and Hispanics/Latinos.
8. Discrimination in mortgage lending against African Americans and Hispanics/Latinos.
9. Lack of access by residents to fair housing information and how to file a fair housing complaint.
10. City of Lakewood is not seen as welcoming publicly to people of color and thereby ought to advertise commitment to stable racial diversity.
11. Necessity of incorporating fair housing into the planning process.
12. Location of public housing and subsidized housing in Lakewood could pose threat of re-segregation in racially integrating cities.

B. Impediments to Fair Housing Choice identified by the Northeast Ohio Sustainable Communities Consortium 2013 Regional AI

The 2013 Regional AI, which was completed by the Northeast Ohio Sustainable Communities Consortium, identified public and private sector impediments to fair housing in the five-county Cleveland Housing Market Area. The impediments to fair housing choice in the private and public sector for the City of Lakewood are listed below:⁷

1. Denial of available housing units in the rental markets.
2. Discriminatory terms, conditions, privileges, or facilities relating to rental.
3. Failure to make reasonable accommodations or modifications.
4. Steering activities in the rental markets.
5. Preferences stated in advertisements for rental housing.
6. Denial of availability of housing in the home purchase markets.
7. Steering activities in home sales markets.

⁷ Northeast Ohio Sustainable Communities Consortium, 2013 Regional Analysis of Impediments to Fair Housing Choice and Fair Housing Equity Assessment, vol.3, Technical Appendix Part 1 (2013).

8. Denial of home purchase loans.
9. Predatory lending in the home purchase market.
10. Failure to comply with accessibility requirements in construction of housing units.
11. Lack of sufficient fair housing policies or practices in Lakewood.
12. Lack of sufficient fair housing outreach and education efforts.
13. Some land use and planning decisions and operational practices resulting in unequal access to government services such as transportation.
14. Policies and practices used decades ago have resulted in segregation of minority populations.
15. Lack of Inclusionary policies.

C. Current Impediments

1. Low income residents of Lakewood are displaced by eviction and rising housing costs
2. Lakewood has limited Accessible Housing Options for People with Disabilities
3. The City of Lakewood's Fair Housing Ordinance does not protect Housing Voucher Program Participants
4. Racial Disparities in Mortgage Lending
5. The Use of Tenant Screening Service to Screen for Criminal Background
6. The City of Lakewood's Fair Housing Ordinance does not protect Families with Children
7. Group Home Minimum Distance Requirement limits Housing Opportunities for People with Disabilities

D. Opportunities to Affirmatively Furthering Fair Housing

1. Criminal Activity Nuisance Ordinance

IV. DEMOGRAPHICS

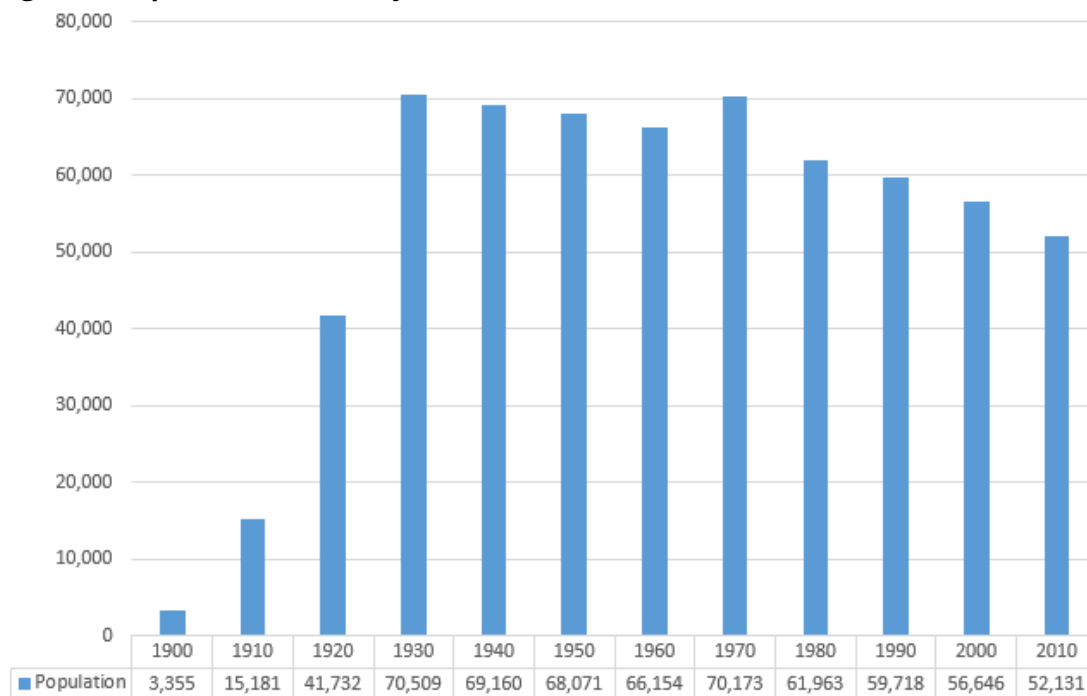
A. Introduction

This section offers a review of general demographic data particular to the classes protected by the federal Fair Housing Act.

B. Total Population

The population of Lakewood has grown and declined in tandem with the trend throughout Cuyahoga County (see Figure 1). After four decades of sustained growth, from 1900 to 1930, the City of Lakewood's population peaked at 70,509. The city experienced a small population decline over three decades before growing to 70,173 in 1970. Since 1970, the City of Lakewood has experienced a population decline, falling by 25.7% from 1970 to 2010 (2010 population: 52,131). Cuyahoga County's total population peaked in 1970 at 1,721,30 and experienced four decades of population loss, 25.6% countywide. In 2016, the total population of Lakewood was 50,866. Interviewees shared that people choose to live in Lakewood for a variety of reasons: an economically and socially-diverse community, proximity to the lake and parks, good schools, access to public transit, and diversity of housing stock in the City of Lakewood. Interviewees commented that people move out of Lakewood in order to buy a home, have more space, go to a more highly ranked school district, or are empty nesters who do not want to care for old housing stock and want a home they can afford where they can age in place. Several interviewees shared that people move out of Lakewood because they cannot afford the rising rents.

Figure 1: Population of the City of Lakewood, 1900-2010



(Source: U.S. Census)

C. Diversity

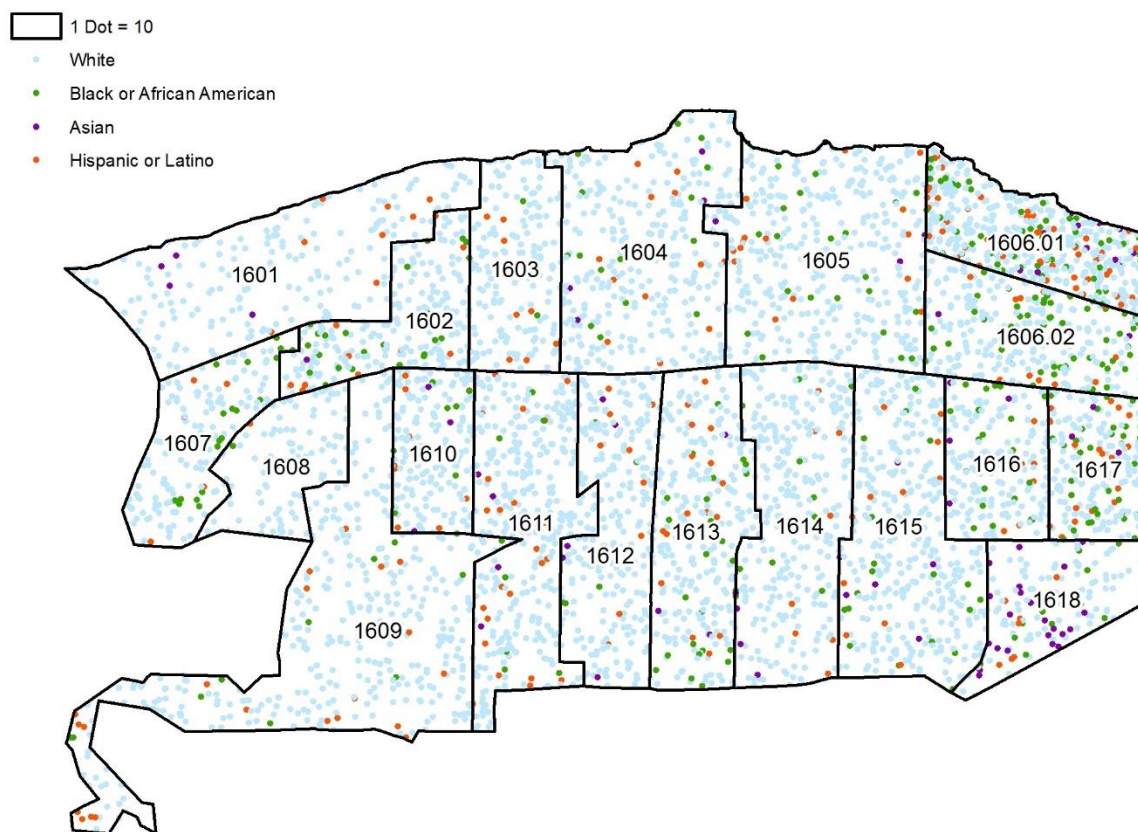
Although the City of Lakewood has become more inclusive of racially diverse groups, the City consists of a predominantly white population (see Table 1). In 1990, Lakewood was 97.5% white; in 2016, Lakewood was 86.8% white. While African Americans make up only 6.9% of the 2016 population, from 2000 to 2010, they experienced a 199.3% increase. The Hispanic/Latino population in Lakewood in 1990 was 2.2%, but by 2010 they made up 4.1% of the population. From 2000 to 2010, the Hispanic/Latino population grew with an increase of 69.2% and makes up 4.9% of the 2016 population. In 2016, the Asian population comprised 1.6% of the population. Figure 2 shows the racial demographics of the City of Lakewood per census tract (see page 8). One interview commented that in terms of diversity in Lakewood, it is a “tale of two cities”— a narrative that the City is very diverse versus a reality in which people of color are marginalized in the City. Some interviews shared that people of color are not integrated successfully into the community, commenting that white households and households of color socialize in separate areas of the City.

Table 1: Racial Demographics of the City of Lakewood, 1990-2010 & 2016

Race/Ethnicity	1990		2000		2010		2016	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
White	58,228	97.5	52,723	93.1	45,598	87.5	46,146	86.8
African American	506	0.9	1,116	2.0	3,340	6.4	3,521	6.9
Hispanic/Latino	896	1.5	1,269	2.2	2,147	4.1	2,475	4.9
Asian	602	1.0	800	1.4	988	1.9	828	1.6
American Indian and Alaskan Native	113	0.2	139	0.2	149	0.3	48	1.0
Two or More Races	N/A	0.0	1,504	2.7	1,392	2.7	2,076	4.1
Other	260	0.4	349	0.6	655	1.3	191	0.4

(Source: 1990 Census; 2000 Census; 2010 Census; 2016 American Community Survey 5-Year Estimates)

Figure 2: Population of the City of Lakewood by Race & Ethnicity, 2016



(Source: 2016 American Community Survey 5-Year Estimates)

Table 2 shows that the majority population of nearly all census tracts in Lakewood is white. Census tracts with a greater number of African Americans include 1606.01 (578 individuals), 1606.2 (521), and 1617 (405). Census tracts with a greater number of Hispanics/Latinos include 1606.01 (453) and 1611 (235). According to HUD data, 26.5% of complaints have been filed on the basis of race in Lakewood from 2005 to 2018.

Table 2: Racial Demographics by Census Tract, City of Lakewood, 2016

Census Tract		White	African American	Hispanic/Latino	Asian	American Indian and Alaskan Native	Two or More Races
1601	Number	1,795	0	91	37	5	16
	Percent	96.9	0.0	4.9	2.0	0.3	0.9
1602	Number	1,862	226	95	9	0	182
	Percent	81.3	9.9	4.2	0.2	0.0	8.0
1603	Number	1,650	36	90	0	0	36
	Percent	94.4	2.1	5.1	0.0	0.0	2.1
1604	Number	2,902	149	120	38	0	153
	Percent	89.2	4.6	3.7	1.2	0.0	4.7
1605	Number	3,456	220	153	29	0	35
	Percent	92.4	5.9	4.1	0.8	0.0	0.9
1606.01	Number	4,297	578	453	152	0	74
	Percent	84.2	11.3	8.9	3.0	0.0	1.5
1606.02	Number	2,135	521	105	19	0	254
	Percent	72.8	17.8	3.6	0.6	0.0	8.7
1607	Number	1,292	210	54	7	0	12
	Percent	84.2	13.7	3.5	0.5	0.0	0.8
1608	Number	952	6	12	4	2	17
	Percent	95.9	0.6	1.2	0.4	0.2	1.7
1609	Number	3,546	106	212	0.0	8	123
	Percent	96.8	2.8	5.5	0.0	0.2	3.2
1610	Number	1,601	78	87	29	0	43
	Percent	91.4	4.5	5.0	1.7	0.0	2.5
1611	Number	3,481	65	235	43	0	33
	Percent	96.1	1.8	6.5	1.2	0.0	0.9
1612	Number	2,416	61	85	52	0	152
	Percent	94.4	2.3	3.2	1.9	0.0	5.6
1613	Number	2,445	243	161	25	12	262
	Percent	81.9	8.1	5.4	0.8	0.4	8.8
1614	Number	2,766	111	83	35	0	195
	Percent	88.5	3.5	2.7	1.1	0.0	6.2
1615	Number	3,474	186	112	56	0	63
	Percent	91.9	4.9	3.0	1.5	0.0	1.7
1616	Number	1,628	214	68	39	0	193
	Percent	77.1	10.1	3.2	1.6	0.0	9.1
1617	Number	1,525	405	186	33	0	168
	Percent	71.1	18.9	8.7	1.5	0.0	7.8
1618	Number	942	106	73	221	16	65
	Percent	68.8	7.9	5.4	16.4	1.2	4.8

(Source: 2016 ACS 5-Year Estimates, Demographics and Housing Estimates)

D. Ethnic Diversity and Foreign-Born Population

The Fair Housing Act protects foreign-born individuals by prohibiting discrimination based on national origin. As shown in Table 3, Lakewood's foreign-born population peaked in 1990 at 8.7% of the population, decreasing to 7.3% in 2016. The decrease of the foreign-born population in Lakewood is the opposite of the trend in Cuyahoga County and of several western suburbs that peaked in 2010 with slight decreases in 2016. Rocky River and Cleveland experienced sustained growth of the foreign-born population from 2000 to 2010 to 2016. However, of the western suburbs profiled in Table 3, Lakewood has the largest population of foreign-born individuals. According to HUD data, 7.4% of complaints have been filed on the basis of national origin in Lakewood from 2005 to 2016.

Table 3: Foreign-Born Population of the City of Lakewood, Select Suburbs, and Cuyahoga County

	2000		2010		2016	
	Number	Percent	Number	Percent	Number	Percent
Lakewood	4,945	8.7	4,320	8.2	3,705	7.3
Rocky River	1,445	7.0	1,719	8.5	1,839	9.0
Fairview Park	1,013	5.8	1,309	7.7	1,238	7.5
Westlake	2,673	8.4	3,398	10.5	2,522	7.8
Cleveland	21,372	4.5	18,932	4.6	19,184	4.9
Cuyahoga County	88,761	6.4	90,526	7.0	87,819	7.0

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimate; 2016 American Community Survey 5-Year Estimate)

As shown in Table 4, in 2010 & 2016, the largest population of foreign-born individuals in the City of Lakewood was European, followed by Asian. In 2000, the largest population of foreign-born individuals was Asian. While the European population experienced a 57.8% increase from 2000 to 2010, the Asian population experienced a 6.5% decrease. The African and Latin American populations experienced increases in population from 2000 to 2010 (68.3% and 99.3% respectively) and decreased from 2010 to 2016 (-75.0% and -76.0% respectively).

Table 4: Foreign-Born Population in the City of Lakewood by Region of Birth

	2000		2010		2016	
	Number	Percent	Number	Percent	Number	Percent
Total	4,945	100.0	4,320	100.0	3,705	100.0
Europe	1,205	24.4	1,902	44.0	1,301	35.1
Asia	1,534	31.0	1,434	33.2	905	24.4
Africa	202	4.1	340	7.9	85	2.3
Oceania	25	0.5	0	0.0	0	0.0
Latin America	278	5.6	554	12.8	133	3.6
North America	130	2.6	90	2.1	48	1.2

(Source: 2000 Census; 2010 Census; 2016 American Community Survey 5-Year Estimates)

Foreign-born individuals in Lakewood are from diverse countries of origin. Albania is the leading country of origin in Lakewood, followed by Romania and Lebanon (see Table 5). Other countries of origin include Greece, India, Other South Central Asia, Germany, Other Eastern Europe, China, Peru, and the United Kingdom. From 2012 to 2014, there was a 35% increase in the number of foreign-born individuals from

Western Asia⁸ (from 645 to 871) in the City of Lakewood. From 2014 to 2016, however, the number of foreign-born individuals from Western Asia decreased by 40% (from 871 to 521). Interviewees shared that following the foreclosure crisis, Lakewood was welcoming to many Nepalese and Bhutanese refugees moving into the city.

Table 5: Country of Origin for Foreign-Born Population in the City of Lakewood, 2016

Country of Origin	Number of Foreign-Born Individuals	Percent of Lakewood Population
Albania	607	1.2
Romania	284	0.6
Lebanon	257	0.5
Greece	132	0.3
Other South Central Asia	121	0.2
India	119	0.2
Germany	107	0.2
Other Eastern Europe	97	0.2
China	97	0.2
Peru	94	0.2
United Kingdom	85	0.2

(Source: 2016 American Community Survey 5-Year Estimates)

E. Families with Children

In 1988, Congress amended the Fair Housing Act to prohibit discrimination based on familial status in response to widespread discrimination against families with children. From 2000 to 2010, there was a 13% decrease in the total number of households with children under 18 in the City of Lakewood. From 2010 to 2016, however, there was a 5.6% increase in the total number of households with families with children under 18 (see Table 6), even though families with children comprise a smaller percentage of the total population in 2016. According to the Department of Housing and Urban Development (HUD) data, from 2005 to 2018, 13.2% of complaints in Lakewood were filed on the basis of family status. Interviewees stated that families with children are attracted to Lakewood because of its school system, its parks, and other amenities. One interviewee shared that the City has limited activities for children (no rec center for kids) and that only recently did the City rebuild one of the basketball courts in the City (13 full courts were demolished in the early 2000s in Lakewood). Some interviewees commented refugee families, who often have large families, face barriers to housing choice in Lakewood as landlords hesitate to rent to families with a large number of children.

⁸ Western Asia Countries include: Iraq, Israel, Jordan, Kuwait, Lebanon, Saudi Arabia, Syria, Yemen, Turkey, Armenia, and Other Western Asia. All data gathered from American Community Survey 5-Year Estimates for 2016, 2015, 2014, 2013, and 2012.

Table 6: Households with Individuals under 18 in the City of Lakewood

	2000		2010		2016	
	Number	Percent	Number	Percent	Number	Percent
City of Lakewood	6,533	24.5	5,675	22.5	5,995	20.8

(Source: 2000 Census; 2010 Census; 2016 American Community Survey 5-Year Estimates)

F. People with Disabilities

Discrimination because of a disability was also made illegal in 1988 as an amendment to the Fair Housing Act. In Lakewood, the largest population with disabilities is the 65 and over age group with 38.8% of 65+ individuals having a disability as shown in Table 7. Nearly 9.7% of 18 to 64-year-olds have a disability and 4.0% of those under 18 in Lakewood. This pattern reflects that of Cuyahoga County as a whole, in which 36.2% of individuals age 65 and over have a disability, 12.5% of 18 to 64-year-olds, and 5.6% of those under 18. According to HUD data, from 2005 to 2018, 27.9% of complaints were filed on the basis of disability in Lakewood. Due to the age of the housing stock in Lakewood, interviewees shared that many units in the City are not accessible and that residents struggle to age in place. The City of Lakewood offers housing support via CDBG funding to people with disabilities, such that they can make necessary improvement to their home for accessibility (e.g. ramp, widening of doors). This is available to landlords, tenants, and homeowners who meet low-to-moderate income qualifications.

Table 7: People with Disabilities in the City of Lakewood, Select Suburbs, and Cuyahoga County, 2016

	Under 18		18-64 years		65 and Over	
	Number	Percent	Number	Percent	Number	Percent
Lakewood	373	4.0	3,472	9.7	2,139	38.8
Rocky River	68	1.6	865	7.6	1,299	29.0
Fairview Park	200	6.0	901	8.8	835	28.4
Westlake	178	2.6	1,050	5.7	1,858	28.4
Cleveland	7,506	8.4	46,864	19.1	22,327	46.0
Cuyahoga County	15,267	5.6	96,509	12.5	72,032	36.2

(Source: 2016 American Community Survey 5-Year Estimates)

V. Income

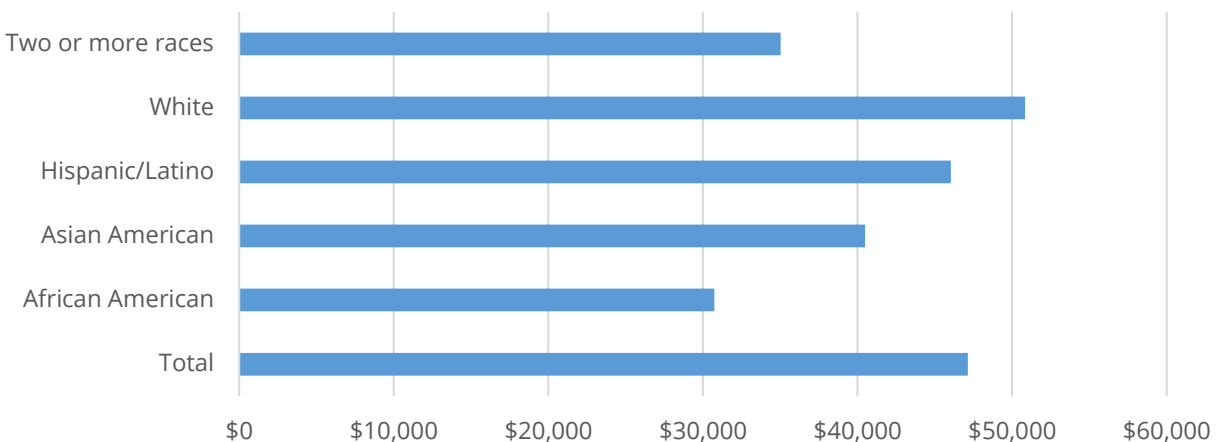
Income directly impacts an individual's or household's housing choice as it can determine whether certain housing and neighborhoods are affordable or out of financial reach. Figure 3 and Table 8 show the median income by race and ethnicity for the City of Lakewood in 2016. The median income for white households is slightly higher (\$50,822) than that of the total population (\$47,145). The median income for African Americans is the lowest at \$30,730; for Hispanics/Latinos, it is \$46,034.

Table 8: Median Household Income by Race & Ethnicity in the City of Lakewood, 2016

Race/Ethnicity	Median Income
Total	\$47,145
African American	\$30,730
Asian American	\$40,481
Hispanic/Latino	\$46,034
White	\$50,833
Two or more races	\$35,034

(Source: 2016 American Community Survey 5-Year Estimates)

Figure 3: Median Household Income by Race & Ethnicity in the City of Lakewood, 2016



(Source: 2016 American Community Survey 5-Year Estimates)

The United States Census determines “poverty thresholds” based upon the size of the household and income. The household is considered in poverty if it falls below its designated income threshold based on its size. Designed in the 1960s, these thresholds are largely determined based on the family’s budget for food.⁹ In the City of Lakewood, 14.4% of individuals were at or under the federal poverty rate in 2016 (see Table 9). Eleven percent (11.4%) of all families were at or under the federal poverty rate in 2016 and seventeen percent (17.2%) of families with children under 18 were at or under the federal poverty rate in 2016 (see Table 12).

⁹ United States Census Bureau, Population: Poverty, Available at: <https://www.census.gov/hhes/www/poverty/about/overview/measure.html>

Table 9: Poverty Rate of Individuals in the City of Lakewood, 2016

	Number	Percentage
City of Lakewood	7,297	14.4

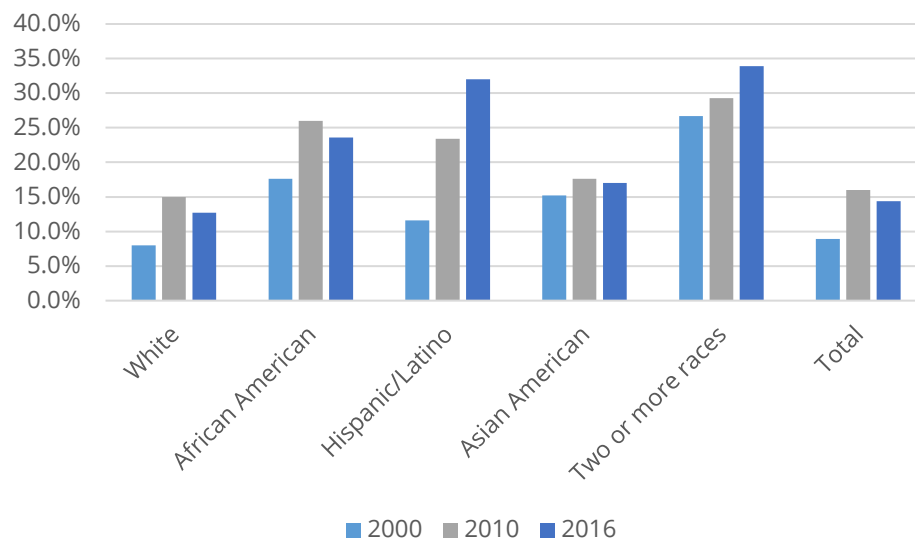
(Source: 2016 American Community Survey 5-Year Estimates)

The following table shows the poverty rate by race and ethnicity of residents of Lakewood from 2000 to 2016 (see Table 10). Minority groups in Lakewood have significantly higher poverty rates in comparison to their white counterpart (12.7% in 2016). Individuals belonging to two or more races have consistently had the highest poverty rate over the last decade and a half, peaking at 33.9% in 2016 (see Figure 4). African Americans have had a consistently high poverty rate over the last 16 years as well, peaking at 26.0% in 2010. The poverty rate for Hispanics/Latinos has increased significantly since 2000, peaking at 32.0% in 2016.

Table 10: Poverty Rate by Race & Ethnicity of Individuals in the City of Lakewood, 2000-2016

Race/Ethnicity	2000	2010	2016
White	8.0%	15.0%	12.7%
African American	17.6%	26.0%	23.6%
Hispanic/Latino	11.6%	23.4%	32.0%
Asian American	15.2%	17.6%	17.0%
Two or more races	26.7%	29.3%	33.9%
Total	8.9%	16.0%	14.4%

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2016 American Community Survey 5-Year Estimates)

Figure 4: Poverty Rate by Race & Ethnicity of Individuals in the City of Lakewood, 2000-2016

(Source: 2000 Census; 2010 American Community Survey 5-Year Estimates; 2016 American Community Survey 5-Year Estimates)

Table 11: Poverty Rate by Census Tract in the City of Lakewood, 2016

Census Tract	Poverty Rate
1601	3.2%
1602	4.6%
1603	6.9%
1604	13.7%
1605	11.1%
1606.01	14.3%
1606.02	24.4%
1607	17.4%
1608	14.1%
1609	5.8%
1610	8.8%
1611	7.8%
1612	9.6%
1613	20.2%
1614	7.5%
1615	18.0%
1616	29.8%
1617	34.5%
1618	40.1%

(Source: 2016 American Community Survey 5-Year Estimates)

Table 11 shows that census tracts 1618 and 1617 have the highest poverty rates in Lakewood (40.1% and 34.5% respectively). Table 12 presents the poverty rate by specific categories of households, families, and individuals living in the City of Lakewood from 2000 to 2016 as well as the general poverty rate of other western suburbs, Cleveland, Cuyahoga County, and the United States. In Lakewood, female-headed households with children have a particularly high poverty rate, peaking at 40.6% in 2016, which is almost three times the poverty rate of the total Lakewood population (14.4%). The poverty rate of all individuals in Lakewood is greater than that of profiled western suburbs, but less than that of Cleveland (36.0% in 2016) and Cuyahoga County (18.5% in 2016). All municipalities and Cuyahoga County experienced a significant increase in the poverty rate from 2000 to 2016.

Table 12: Poverty Rate by Additional Categories in the City of Lakewood, Poverty Rate of Individuals in Select Suburbs, Cuyahoga County, & the United States, 2000-2016

Poverty Rate	2000	2010	2016
Lakewood	Percent	Percent	Percent
Female-headed household w/ related children under 18	20.5	26.7	40.6
Age 65 or over	8.5	15.3	11.1
All Families	6.1	11.3	11.4
Families w/ related children under 18	10	18.2	17.2
All Individuals	8.9	16	14.4
Rocky River	2.3	5.5	4.7
Fairview Park	4.1	7.3	8.8
Westlake	2.5	4.3	4.9
Cleveland	26.3	31.2	36.0
Cuyahoga County	13.1	16.4	18.5
United States	12.4	13.8	15.1

(Source: 2000 Census; 2010 Census; 2016 American Community Survey 5-Year Estimates)

VI. Employment

Over the past five years, the unemployment rate has decreased in Lakewood; it peaked in 2012 at 9.4% and has steadily decreased to 6.0% in 2016 (see Table 13). The Cleveland-Elyria Metropolitan Statistical Area had an unemployment rate of 5.6% in 2016.¹⁰ The population of 16-year-olds and over in Lakewood, which represents those eligible to enter the labor force, has fluctuated over the past 5 years, declining by 2% in 2016 (147 individuals). While the population eligible to enter the workforce declined, there was an increase in the civilian labor force from 2015 to 2016.

Table 13: Labor Force in the City of Lakewood, 2012 to 2016

	2012	2013	2014	2015	2016
Population 16 or over	43,101	45,512	42,611	42,592	42,445
Civilian Labor Force	32,045	31,531	31,368	30,946	31,512
Employed	29,027	28,605	28,752	28,776	29,617
Unemployed	3,018	2,925	2,616	2,170	1,885
Unemployment Rate	9.4%	9.3%	8.3%	7.0%	6.0%

(Source: American Community Survey 5-Year Estimates for 2012-2016)

Table 14 highlights the industries present in Cuyahoga County as of 2016, detailing the number of workplace establishments of each sector, employees, and wages. Table 15 presents the number of employees in each type of industry in the City of Lakewood as of 2016. The largest industry employers in Lakewood are educational services/healthcare; professional, scientific, and management, and administrative and waste management services; retail; and arts, entertainment, and recreation, and accommodation and food services.

Table 14: Industries, Cuyahoga County, 2016

	Number of Establishments	Number of Employees	Total Wages	Average Weekly Wage
Private Sector Total	34,409	626,696	\$33,507,164,516	\$1,028
Goods Producing	4,148	88,927	\$5,535,785,830	\$1,197
Service Providing	30,262	537,769	\$27,971,379,686	\$1,000
Federal Government	N/A	16,148	\$1,231,923,078	\$1,467
State Government	N/A	4,208	\$288,065,146	\$1,316
Local Government	N/A	72,379	\$3,809,607,417	\$1,012

(Source: Ohio Department of Development, Cuyahoga County Profile 2016)

¹⁰ U.S. Bureau of Labor Statistics, Local Area Unemployment Statistics; Cleveland-Elyria, OH Metropolitan Statistical Area, 2016.

Table 15: Employees in Types of Industries, City of Lakewood, 2016

Type of Industry	Number	Percent
Agriculture, forestry, fishing/hunting, and mining	141	0.5
Construction	1,167	3.9
Manufacturing	2,867	9.7
Wholesale trade	771	2.6
Retail trade	3,440	11.6
Transportation and warehousing, and utilities	1,073	3.6
Information	718	2.4
Finance and insurance, and real estate and rental and leasing	2,144	7.2
Professional, scientific, and management, and administrative and waste management services	3,829	13.2
Educational services, and health care and social assistance	7,436	25.1
Arts, entertainment, and recreation, and accommodation and food services	3,424	11.6
Other services, except public administration	1,506	5.1
Public administration	1,101	3.7

(Source: American Community Survey 2016 5-Year Estimates)

VII. HOUSING

A. Homeownership Rates

There are numerous social benefits to homeownership for communities and individuals, even following the housing crisis nearly a decade ago. Such social benefits include stability, political participation, community investment, positive educational outcomes for children, wealth creation, quality housing, and lower resident turnover. Research on the perception of social benefits of owning a home after the housing crisis shows that over the long-term, people prefer owning over renting, will reinvest in the market, and still expect the financial-social benefits of homeownership.¹¹

The City of Lakewood offers the Lakewood HOME Program, a mortgage financing package available to qualified first-time homebuyers. As shown in Table 16, in the City of Lakewood, there are significant disparities in homeownership among communities of color, particularly within the African American community. Overall, the homeownership rate for the City of Lakewood is 44.3%. Nearly half of all white households own homes (48.2%), whereas only 9.9% of African Americans own homes in Lakewood. Hispanic/Latino households show a rate of 26.3% owning homes, while Asian American households in Lakewood have a homeownership rate comparable to white households (47.3%). Households comprised of two or more races show a rate of 27.9% owning homes. Among the minority groups, African Americans in Lakewood have the lowest homeownership rate. Figure 5 shows the distribution of owner-and-renter-occupied housing units by census tract in the City of Lakewood.

Table 16: Housing Tenure by Race & Ethnicity of Household in the City of Lakewood, 2016

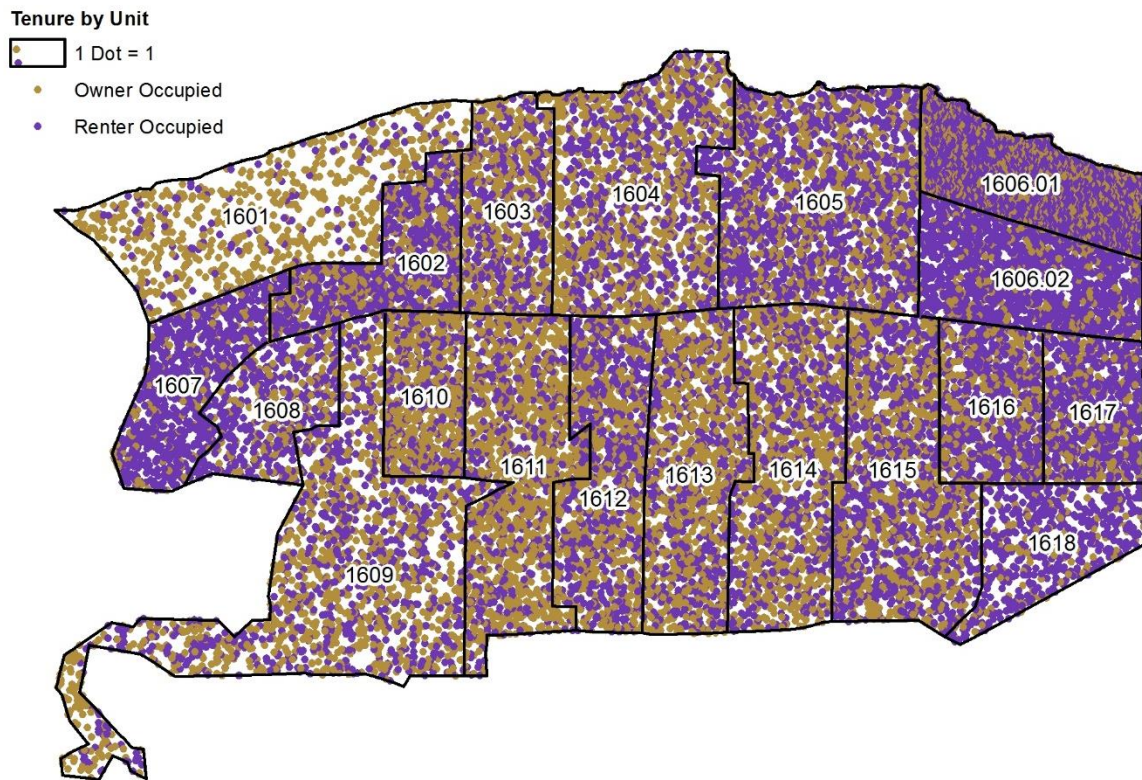
Race/Ethnicity	Owner-occupied	Renter-occupied	Home Ownership Rate
White	10,507	11,280	48.2%
African American	172	1,574	9.9%
Asian American	149	166	47.3%
American Indian/Alaska Native	5	19	20.8%
Other	23	25	47.9%
Two or more races	148	383	27.9%
Hispanic/Latino	238	666	26.3%

(Source: 2016 American Community Survey 5-Year Estimates)

As show in Table 17, within Lakewood, census tracts 1606.01 and 1611 have the greatest number of owner-occupied units (1,104 and 1,080 respectively). Census tracts 1606.01 and 1606.02 have the greatest number of renter-occupied units (2,380 and 1,230 respectively). In terms of total occupied units in each census tract, the census tracts with the highest rate of homeownership are census tracts 1601 (82%), and 1611 (69.7%).

¹¹ Rohe, W. & Lindblad, M. *Reexamining the Social Benefits of Homeownership after the Housing Crisis*. Joint Center for Housing Studies of Harvard University (August 2013).

Figure 5: Owner-Occupied & Renter-Occupied Housing Units by Census Tract in the City of Lakewood, 2016



(Source: 2016 American Community Survey 5-Year Estimates)

Table 17: Owner-Occupied & Renter-Occupied Housing Units by Census Tract, 2016

Census Tract	Owner-Occupied	Renter-Occupied	Homeownership Rate in Census Tract
1601	555	122	82.0%
1602	418	694	37.6%
1603	452	337	57.3%
1604	778	636	55.0%
1605	785	1,188	39.8%
1606.01	1,104	2,380	31.7%
1606.02	264	1,230	17.7%
1607	142	797	15.1%
1608	172	359	32.4%
1609	968	772	55.6%
1610	487	281	63.4%
1611	1,080	469	69.7%
1612	630	595	51.4%
1613	775	533	59.3%
1614	816	588	58.1%
1615	835	882	48.6%
1616	346	545	38.8%
1617	273	596	31.4%
1618	124	457	21.3%

(Source: 2016 American Community Survey 5-Year Estimates)

B. Rental Costs

The City of Lakewood requires that all landlords, including those that lease single-family or two-family homes, obtain and maintain a housing license each year.¹² A housing license is to be secured by November 1 of each year and expires on October 31 of that year.¹³ The City's Division of Housing and Building provides code enforcement and plan examination services. The City conducts annual inspections on rental property, permit inspections, complaint inspections, and prior to sale inspections. Landlords are required to fulfill two of the following three things each year when applying for their housing license: 1) a written rental agreement in leasing, 2) use a reputable screening agency for the screening of tenants, and/or 3) has attended a city-approved landlord-tenant informational seminar within the past two years.¹⁴

The monthly cost of rent in Lakewood has fluctuated over the last decade and a half. In 2000, the majority of rental units were in the \$0-499 and \$500-749 price range (see Figure 6 and Table 18). By 2010, the number

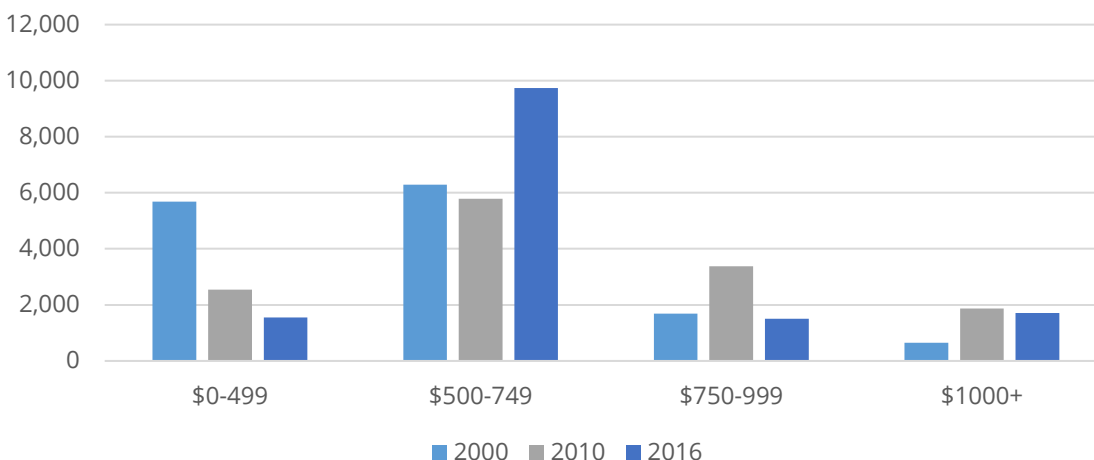
¹² Codified Ordinance of the City of Lakewood § 1306.43 (Ord. 55-10. Passed 5-16-2011). The exception to the housing license requirement is owner-occupants in one- and two-family homes.

¹³ Codified Ordinance of the City of Lakewood § 1306.47 (Ord. 18-18. Passed 10-1-2018).

¹⁴ City of Lakewood, *Best Rental Practices: A Manual for Lakewood Landlords*, January 2016 Edition. Accessed via: <http://www.onelakewood.com/wp-content/uploads/2016/02/Best-Rental-Practices-January-2016-edition.pdf>

of rentals with a monthly rent of \$750-999 increased dramatically (99.3% increase), while the number of rentals renting in the \$0-499 and \$500-749 ranges decreased. In 2016, the number of rental units in the \$500-749 range increased by 68.3%, while units in all other rent ranges decreased. From 2000 to 2016, rentals in the lowest rent range (\$0-499) have steadily decreased. Rentals in the \$1000+ price range increased by 187.4% from 2000 to 2010, with just a slight decrease in rental units in this range from 2010 to 2016. Interviewees shared that many landlords will not rent to an individual with an eviction history and that apartments with affordable rents are rapidly decreasing in the city for low- and moderate-income households. The rents of older complexes are being raised to unaffordable prices due to renovations of these complexes and long-term tenants are being forced out by high rents and non-renewal of lease.

Figure 6: Units per Rental Cost Range in the City of Lakewood, 2000-2016



(Source: 2000 Census Data; 2010 American Community Survey 5-Year Estimates; 2016 American Community Survey 5-Year Estimates)

Table 18: Units per Rental Cost Range in the City of Lakewood, 2000-2016

Monthly Rent	2000	2010	2016
\$0-499	5,680	2,543	1,556
\$500-749	6,284	5,787	9,742
\$750-999	1,692	3,373	1,507
\$1000+	649	1,865	1,715

(Source: 2000 Census Data; 2010 American Community Survey 5-Year Estimates; 2016 American Community Survey 5-Year Estimates)

Table 19 shows that single-family/one-unit rentals dominate the Lakewood rental housing market, reaching its peak in 2016 at 11,147 units. The second largest type of rental is 2-4 unit buildings; though the number of rentals of this size decreased from 2000 to 2016 overall, there are 6,681 of such rentals in Lakewood. Rentals with 20 or more units have maintained a large presence in the Lakewood rental housing market over the last decade and a half with 6,350 of such rentals.

Table 19: Rental Units by Building Size in the City of Lakewood, 2000-2016

	2000	2010	10 Year Change	2016	6 Year Change
Single-Family/1 Unit	10,711	10,540	-1.6%	11,147	5.8%
2-4 Units	7,488	7,392	-1.3%	6,681	-9.6%
5-9 Units	1,063	1,293	21.6%	1,165	-9.9%
10 to 19 Units	2,103	2,297	9.2%	1,843	-19.8%
20 or more units	7,030	6,562	-6.7%	6,350	-3.2%

(Source: 2000 Census; 2010 & 2016 American Community Survey 5-year Estimates)

As shown in Table 20, within Lakewood, census tracts 1609 and 1611 have the greatest number of single-family rental units (1,072 and 1,012 respectively). Census tracts 1615 and 1611 have the greatest number of two-family rentals (677 and 517 respectively). In terms of three-and-four family rental units, census tracts 1604 and 1618 have the greatest number (308 and 273 respectively). Census tract 1606.01 has the largest number of rentals in a building of 50 or more units (2,714).

Table 20: Rental Units by Building Size and Census Tract in the City of Lakewood, 2016

Census Tract	Single-Family/1 unit	2 Family	3-4 Units	5-9 Units	10-19 Units	20 to 49 Units	50 or more Units
1601	658	94	35	0	0	0	0
1602	483	182	100	33	68	49	289
1603	456	268	53	17	39	0	0
1604	792	201	308	101	111	104	0
1605	843	260	111	51	136	150	518
1606.01	141	0	66	129	421	472	2,714
1606.02	330	317	193	311	190	282	35
1607	255	86	33	9	41	129	515
1608	249	96	32	52	49	73	0
1609	1,072	216	39	89	247	93	9
1610	510	202	48	25	16	12	0
1611	1,012	517	74	20	28	27	53
1612	686	396	54	73	86	77	62
1613	855	220	38	17	44	52	173
1614	903	488	82	18	34	44	0
1615	920	677	81	15	132	154	9
1616	440	256	126	53	21	33	104
1617	429	180	125	23	163	96	18
1618	113	154	273	129	17	4	0

(Source: 2016 American Community Survey 5-Year Estimates)

C. Age of Housing Stock

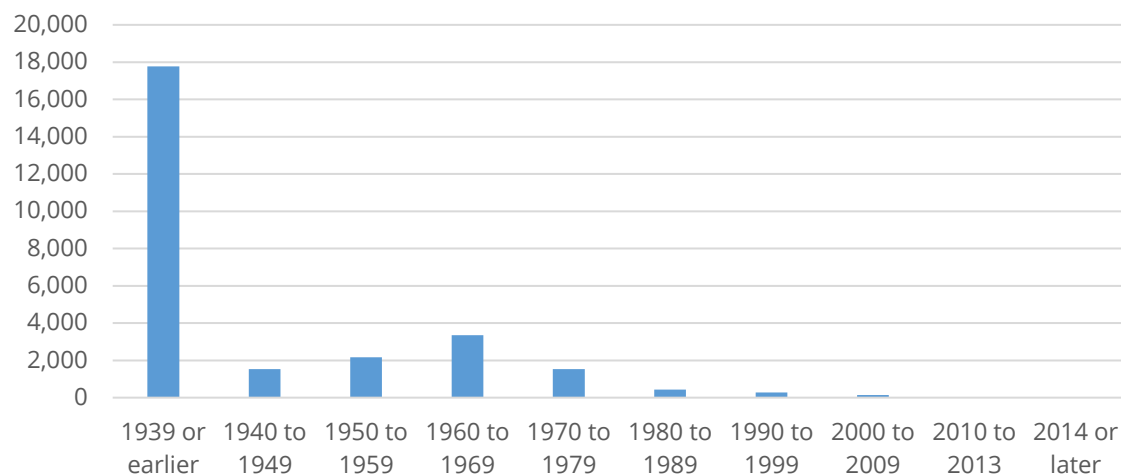
In 1988, the Fair Housing Amendments Act included a provision that required certain new multifamily housing to be constructed with accessible features to ensure that people with disabilities have more housing options and greater housing choice. While this did not apply to single-family housing, new construction of such housing can more easily integrate construction with accessible features than can older housing stock. The age of housing stock can be reflective of the overall quality of the housing market, as newer construction exhibits a growing housing market and real estate field.

A further issue related to the age of housing stock in a given area is the presence of lead-based paint. Lead-based paint was banned in the United States in 1977; thus, all homes built after 1977 should be lead-free. Any housing built before 1977 is at risk of having lead-based paint. Lead poisoning via lead-based paint can have a serious and irreparable effect on the developmental growth of young children.¹⁵ Therefore, families with children are a primary risk group for lead-based paint in old housing stock.

The majority of housing in the City of Lakewood was built before 1980; the 1930s were the peak building period in the City, followed by the 1960s (see Figure 7 and Table 21). Thus, most housing in Lakewood is likely inaccessible to persons with disabilities and at risk of lead-based paint. In addition, the majority of multifamily structures were built in Lakewood before the amendment directing accessible features to be included in the construction of such structures (see Table 22). The City of Lakewood has a home vacancy rate of 2.1%, or 2,767 homes, as of 2016. Interviewees commented that a top housing concern in Lakewood is the quality of housing due to old housing stock and the ability of individuals to “age in place.” Every three years, the City of Lakewood conducts a visual external inspection of the 13,000+ residential structures in the City, ranking the structures on a point scale from one to four; three and four-rated structures are those that the City focuses on for quality improvements. The following figures and tables (Figure 7, Table 21, and Table 22) are taken from the American Community Survey (ACS); the sampling methodology of the ACS does not capture new construction made in the past four years at this time.

¹⁵ Mayo Clinic, “Lead Poisoning,” Available at: <https://www.mayoclinic.org/diseases-conditions/lead-poisoning/symptoms-causes/syc-20354717>.

Figure 7: Year Housing Built in the City of Lakewood by Decade



(Source: 2016 American Community Survey 5-Year Estimates)

Table 21: Year Housing Built in the City of Lakewood by Decade

Year Built	Number	Percentage
2014 to 2016	0	0.0
2010 to 2013	28	0.1
2000 to 2009	137	0.5
1990 to 1999	275	1.0
1980 to 1989	432	1.9
1970 to 1979	1,537	5.6
1960 to 1969	3,348	12.3
1950 to 1959	2,167	8.0
1940 to 1949	1,531	5.6
1939 or earlier	17,777	65.3
Total	27,232	100.0

(Source: 2016 American Community Survey 5-Year Estimates)

Table 22: Occupied Rental Housing Units in Structure with 5 or more Units by Year Built in the City of Lakewood

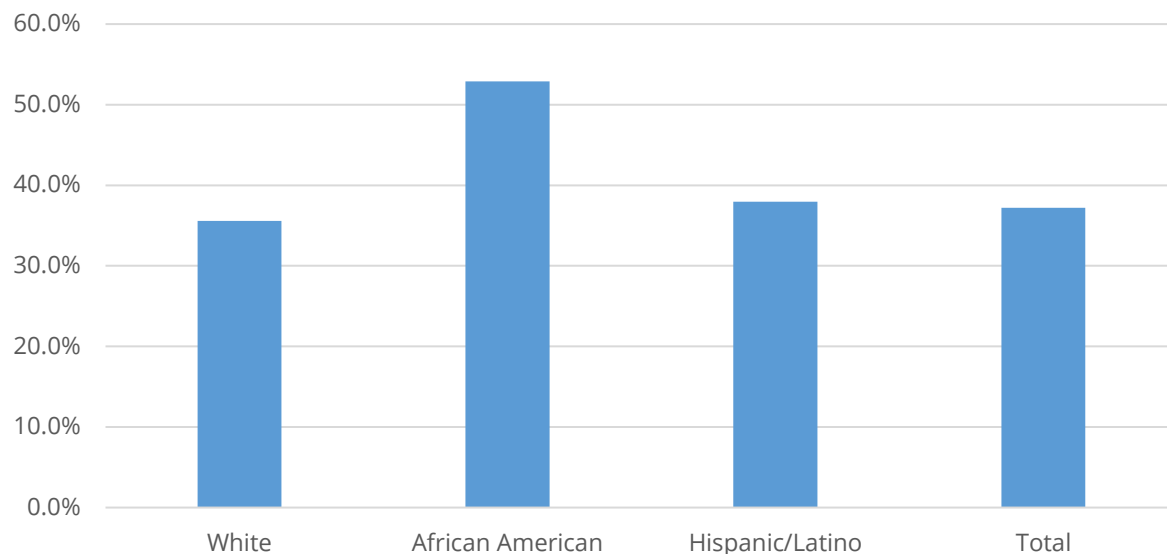
Year Built	Number	Percentage
2010 to 2016	16	0.2
2000 to 2009	41	0.6
1980 to 1999	441	6.1
1960 to 1979	2,835	38.9
1940 to 1959	1,396	19.2
1939 or earlier	2,557	35.1
Total	7,286	100.0

(Source: 2016 American Community Survey 5-Year Estimates)

D. Housing Burden

A measurement of the quality of housing in Lakewood includes those households with disproportionate housing needs. Housing problems are determined by incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, and a cost burden greater than thirty percent.¹⁶ Nearly fifty-three percent (52.8%) of African American households experience such housing problems, while 38% of Hispanic/Latino households and 35.6% of white households do. In the City of Lakewood, 37.2% of households experience housing problems (see Figure 8). Severe housing problems, defined as the above issues but with a cost burden greater than 50%, mirrors this pattern. Nearly 31% (30.8%) of African American households experience severe housing problems, while 22.5% of Hispanic/Latino households and 17.3% of white households do. In the City of Lakewood, 18.5% of households experience severe housing problems (see Figure 9). Severely cost-burdened households in Lakewood, defined as households paying more than 50% of their income for housing, include African American households at nearly 28%, whereas Hispanic/Latino and white households experience severe cost burden to a much smaller degree (18.3% and 15.7% respectively, see Figure 10). In the City of Lakewood, 16.8% of households experience severe housing cost burden.

Figure 8: Households Experiencing Housing Problems by Race & Ethnicity in the City of Lakewood, 2010

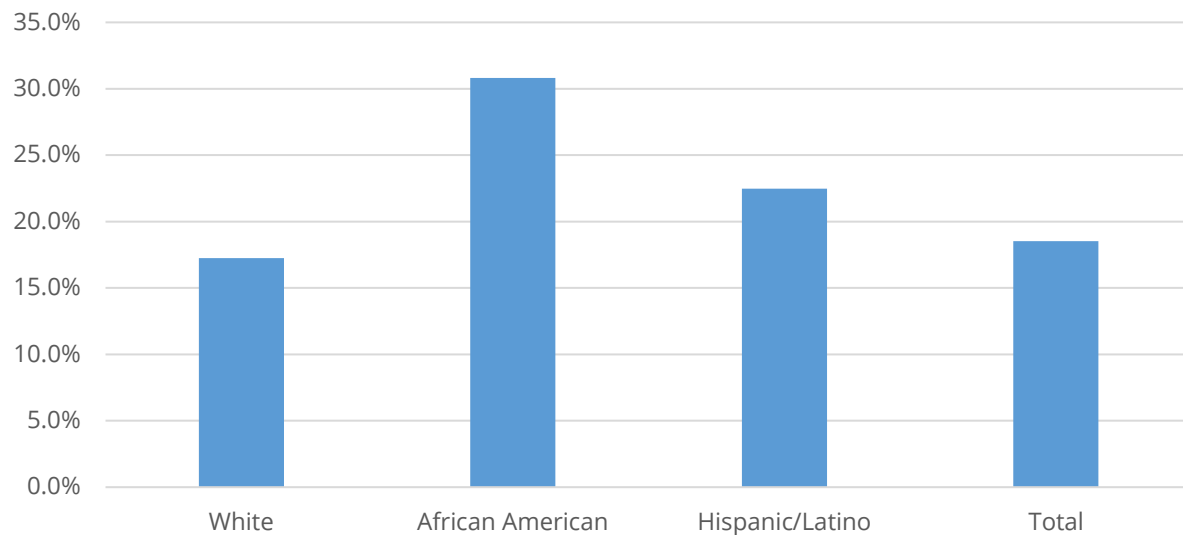


(Source: 2010 Census, AFFH Tool)

¹⁶ The United States Department of Housing and Urban Development defines cost-burdened families as those “who pay more than 30% of their income for housing” and “may have more difficulty affording necessities such as food, clothing, transportation, and medical care.” Severe cost burden is defined as paying more than 50% of one’s income for housing.

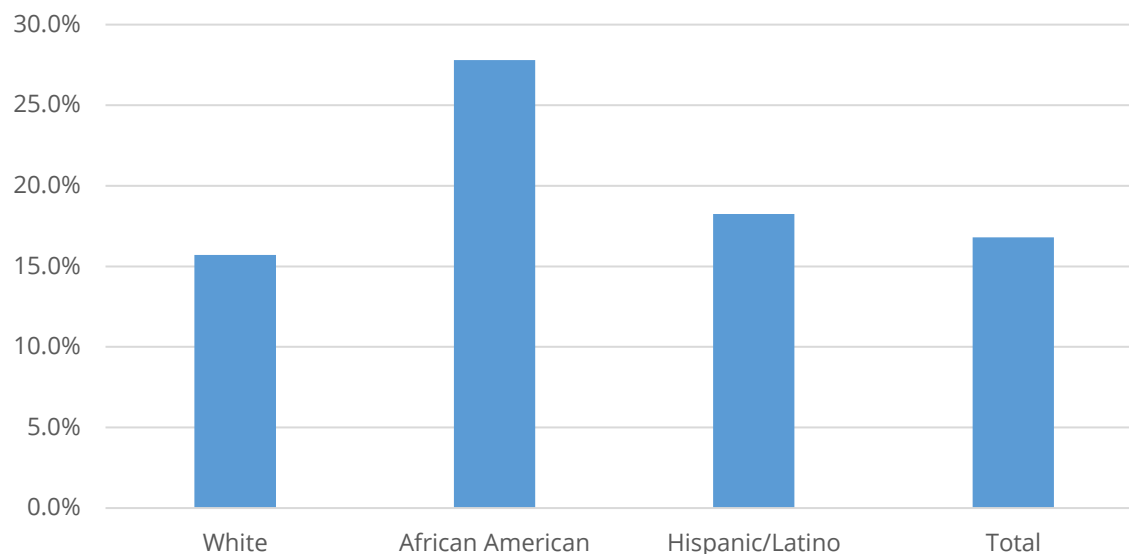
Source: HUD Office of Policy Research and Development, “Rental Burdens: Rethinking Affordability Measures,” Edge magazine, Accessed via: https://www.huduser.gov/portal/pdredge/pdr_edge_featd_article_092214.html

Figure 9: Households Experiencing Severe Housing Problems by Race & Ethnicity in the City of Lakewood, 2010



(Source: 2010 Census, AFFH Tool)

Figure 10: Households Experiencing Severe Housing Cost Burden by Race & Ethnicity in the City of Lakewood, 2010



(Source: 2010 Census, AFFH Tool)

Residents who are housing-cost burdened often face housing insecurity. Some make sacrifices in other areas of their household budgets such as groceries, utilities, or medication to ensure they maintain their housing. Others who are unable to do so may face eviction and homelessness. Lakewood residents who are behind on their rent and have received a 3-day notice to vacate or who have been summoned to court for eviction from their homes may access emergency assistance provided through Lakewood Community

Services Center's (LCSC) Homelessness Prevention Services (HPS) whose funding is provided through the Emergency Solutions Grant Program. LCSC provided data collected from the HPS for the calendar years 2015-2017.¹⁷

Within that timeframe, HPS assisted 701 individuals experiencing housing insecurity, eviction, or homelessness. People of color, families with children and people with disabilities living in the City of Lakewood are disproportionately served by HPS, showing that they disproportionately face housing insecurity and homelessness. Although African Americans comprise just 6.9% of Lakewood's population (see page 7), 26.8% of individuals who relied on HPS were African American. This illustrates a high rate of housing insecurity among African American residents within the City. Similarly, while Latino residents account for approximately 4.9% of Lakewood residents (see page 7), they account for 8.7% of those who relied on HPS assistance.

Lakewood families with children also faced greater housing insecurity than the average Lakewood household. While families with minor children account for approximately 20.8% of all Lakewood households, 41.2% of households that received assistance from HPS were families with minor children. Twenty-six point one percent of those who received HPS assistance had a disability. Five percent of HPS-assisted adults reported they were a survivor of domestic violence and 4.2% were veterans.

The City of Lakewood housing is largely comprised of rentals (see Table 17); unsurprisingly 97.8% of adults HPS assisted reported that they rented at the time. HPS also assisted 2 homeowners and 7 persons experiencing homelessness. Fully 92% of those receiving HPS assistance were renters who receive no other housing subsidy. Among the renters, 1 had a VASH housing voucher for veterans and 35 had another form of short- or long-term rental assistance. Of the adults assisted by HPS, 86.7% reported living on less than \$18,000 a year and 16.6% of adults assisted reported having no income. In addition to emergency financial assistance, HPS also provides Housing Stability Case Management Services which include counseling and screening for and referrals to mainstream benefits and other community resources for which a family may qualify.

¹⁷ Cuyahoga County Annual Performance Report for Lakewood Community Services Center Emergency Solutions Grant Prevention Program for the calendar years 2015-2017 as recorded in the Cuyahoga County Continuum of Care's Homeless Management Information System.

As shown in Table 23, within Lakewood, census tracts 1602, 1604, and 1618 have the highest percentage of renters who spend 30 to 34.9% of their income on housing (13.4%, 12.3%, and 11.9% respectively). Census tracts 1618, 1606.02, and 1614 have the highest percentage of renters who spend 35% or more of their income on housing (48.5%, 43.0%, and 42.9% respectively). Census tracts 1618, 1614, and 1617 have the highest total percentage of housing cost-burdened renters (60.4%, 52.5%, and 47.5% respectively). In the City of Lakewood, 39.1% of renters are cost-burdened.

Table 23: Renter Households Experiencing Cost Burden by Census Tract in the City of Lakewood, 2016

Census Tract	Percentage Who Spent 30 to 34.9% of Their Gross Income on Housing	Percentage Who Spent 35% or More of Their Gross Income on Housing	Total Percentage that is Cost-Burdened
1601	3.4	4.3	7.7
1602	13.4	23.2	36.6
1603	8.7	25.8	34.5
1604	12.3	22.0	34.3
1605	9.0	38.4	47.4
1606.01	4.7	30.9	35.6
1606.02	3.5	43.0	46.5
1607	3.5	21.6	25.1
1608	5.8	21.1	26.9
1609	6.0	34.0	40.0
1610	7.6	23.2	30.8
1611	4.5	20.5	25.0
1612	7.9	31.7	39.6
1613	6.3	35.5	41.8
1614	9.6	42.9	52.5
1615	1.3	39.4	40.7
1616	3.7	31.9	35.6
1617	6.6	40.9	47.5
1618	11.9	48.5	60.4
Total	6.5	32.6	39.1

(Source: 2016 American Community Survey 5-Year Estimates)

As shown in Table 24, within Lakewood, census tracts 1617, 1603, and 1616 have the highest percentage of homeowners with a mortgage who spend 30 to 34.9% of their income on housing (12.6%, 11.6%, and 10.9% respectively). Census tracts 1618, 1606.01, and 1608 have the highest percentage of homeowners with a mortgage who spend 35% or more of their income on housing (49.4%, 36.8%, and 32.8% respectively). Census tracts 1618, 1606.01, and 1617 have the highest total percentage of housing cost-burdened homeowners with a mortgage (52.9%, 39.0% and 36.3% respectively). In the City of Lakewood, 25.6% of homeowners with a mortgage are cost-burdened.

Table 24: Owner Households with a Mortgage Experiencing Cost Burden by Census Tract in the City of Lakewood, 2016

Census Tract	Percentage Who Spent 30 to 34.9% of Their Gross Income on Housing	Percentage Who Spent 35% or More of Their Gross Income on Housing	Total Percentage that is Cost-Burdened
1601	6.9	19.3	26.2
1602	6.7	19.4	26.1
1603	11.6	15.6	27.2
1604	3.3	26.3	29.6
1605	9.1	24.9	34.0
1606.01	2.2	36.8	39.0
1606.02	9.6	22.9	32.5
1607	0.0	0.0	0.0
1608	0.0	32.8	32.8
1609	2.2	18.6	20.8
1610	1.5	12.6	14.1
1611	3.2	15.2	18.4
1612	1.3	19.4	20.7
1613	1.2	16.7	17.9
1614	7.7	17.6	25.3
1615	4.2	21.3	25.5
1616	10.9	12.4	23.3
1617	12.6	23.7	36.3
1618	3.5	49.4	52.9
Total	4.8	20.8	25.6

(Source: 2016 American Community Survey 5-Year Estimates)

As shown in Table 25, within Lakewood, census tracts 1611, 1612, and 1617 have the highest percentage of homeowners without a mortgage who spend 30 to 34.9% of their income on housing (10.7%, 7.8%, and 7.6% respectively). Census tracts 1603, 1604, and 1616 have the highest percentage of homeowners without a mortgage who spend 35% or more of their income on housing (29.5%, 29.5%, and 28.2% respectively). Census tracts 1616, 1603, and 1604 have the highest total percentage of housing cost-burdened homeowners without a mortgage (32.4%, 29.5% and 29.5% respectively). In the City of Lakewood, 16.3 % of homeowners without a mortgage are cost-burdened.

Table 25: Owner Households without a Mortgage Experiencing Cost Burden by Census Tract in the City of Lakewood, 2016

Census Tract	Percentage Who Spent 30 to 34.9% of Their Gross Income on Housing	Percentage Who Spent 35% or More of Their Gross Income on Housing	Total Percentage that is Cost-Burdened
1601	0.0	8.7	8.7
1602	6.8	0.0	6.8
1603	0.0	29.5	29.5
1604	0.0	29.5	29.5
1605	5.4	11.6	17.0
1606.01	3.6	23.5	27.1
1606.02	0.0	7.5	7.5
1607	0.0	8.2	8.2
1608	0.0	9.8	9.8
1609	0.0	3.3	3.3
1610	0.0	0.0	0.0
1611	10.7	8.5	19.2
1612	7.8	3.6	11.4
1613	0.0	12.6	12.6
1614	0.0	17.9	17.9
1615	0.0	14.1	14.1
1616	4.2	28.2	32.4
1617	7.6	0.0	7.6
1618	0.0	0.0	0.0
Total	3.3	13.0	16.3

(Source: 2016 American Community Survey 5-Year Estimates)

E. Eviction

Residents with limited income who are unable to maintain their rental obligations often face eviction. For those who face eviction, their limited income which led to the eviction action typically also limits their ability to obtain legal counsel to represent them in court. In 2017, 545 eviction actions were filed with Lakewood Municipal Court. Defendants (tenants facing eviction) were represented by an attorney in only 13 of these cases, or approximately 2.4% of cases.¹⁸ Given the increasingly common rental practice of denying tenancy to those with prior evictions, particularly recent evictions, hundreds of Lakewood families each year may struggle to maintain their residence in the City of Lakewood. While Lakewood Community Services Center's Homelessness Prevention Services data is not an absolute proxy for those who are, in fact, evicted and does not include information for all who face eviction or the threat of eviction¹⁹, it can provide important insight into the sectors of the City's population most commonly facing housing insecurity or eviction.

F. Federally-Assisted Housing

There are three federally-assisted housing programs in the City of Lakewood: Project-based Section 8, Housing Choice Voucher Program, and multi-family housing. There are no public housing units in the City of Lakewood. Cuyahoga Metropolitan Housing Authority administers the majority of housing choice vouchers in the county, including within Lakewood. Only 2.5% of all Housing Choice Voucher Program (HCVP) households in Cuyahoga County reside in the City of Lakewood (369 of 14,946 HCVP CMHA households in the county as of 2016). Table 26 and Figure 11 display the number of housing units being utilized for each program in 2017 (LIHTC data from 2016). In 2017, there were 1,098 total federally-assisted housing units, which accounts for 4.0% of total housing units; 1.8% of total housing units are project-based Section 8 housing and 1.2% of total housing units are HCV program units. The City of Lakewood has three Low Income Housing Tax Credit (LIHTC) properties, totaling 238 units.²⁰ Figure 12 shows the distribution of federally-assisted housing units by program category in Lakewood in 2018. Interviewees shared that households with vouchers face denial of housing in Lakewood and that very little affordable housing has been built in Lakewood for low- and moderate-income households.

¹⁸ Lakewood Municipal Court, Civil Docket Query: 01/01/2017 – 12/31/2017.

¹⁹ HPS assistance through Lakewood Community Services Center is only available to Lakewood residents who will use the assistance at their current Lakewood residence or another residence within Lakewood. Due to increasing housing costs, additional Lakewood residents are forced to move to more affordable housing outside of the City and are ineligible to receive assistance through HPS.

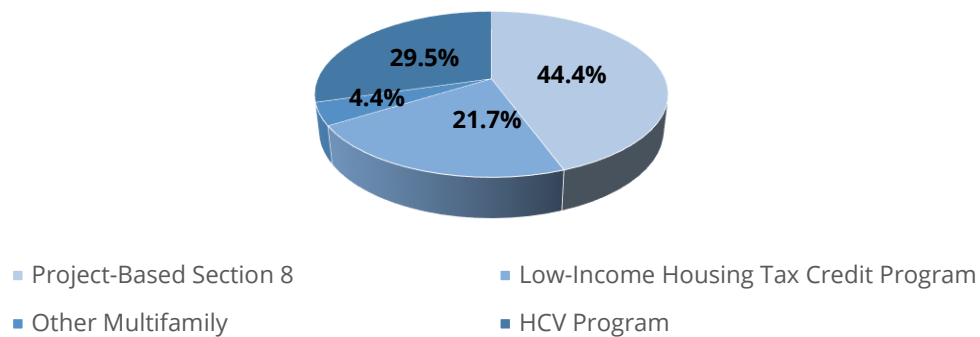
²⁰ United States Department of Housing & Urban Development, "LIHTC Database Access, City of Lakewood," Accessed via: <https://lihtc.huduser.gov>

Table 26: Federally-Assisted Housing Units by Program Category in the City of Lakewood, 2017

Housing Units	Number	Percentage of Total Housing Units	Percentage of Supported Housing Units
Public Housing	N/A	N/A	N/A
Project-Based Section 8	488	1.8	44.4
Other Multifamily	48	0.2	4.4
HCV Program	324	1.2	29.5
Low-Income Housing Tax Credit Program	238	0.9	21.7
Total Federally Assisted Housing Units	1,098	4.0%	100.0
Total Housing Units	27,232	100.0	N/A

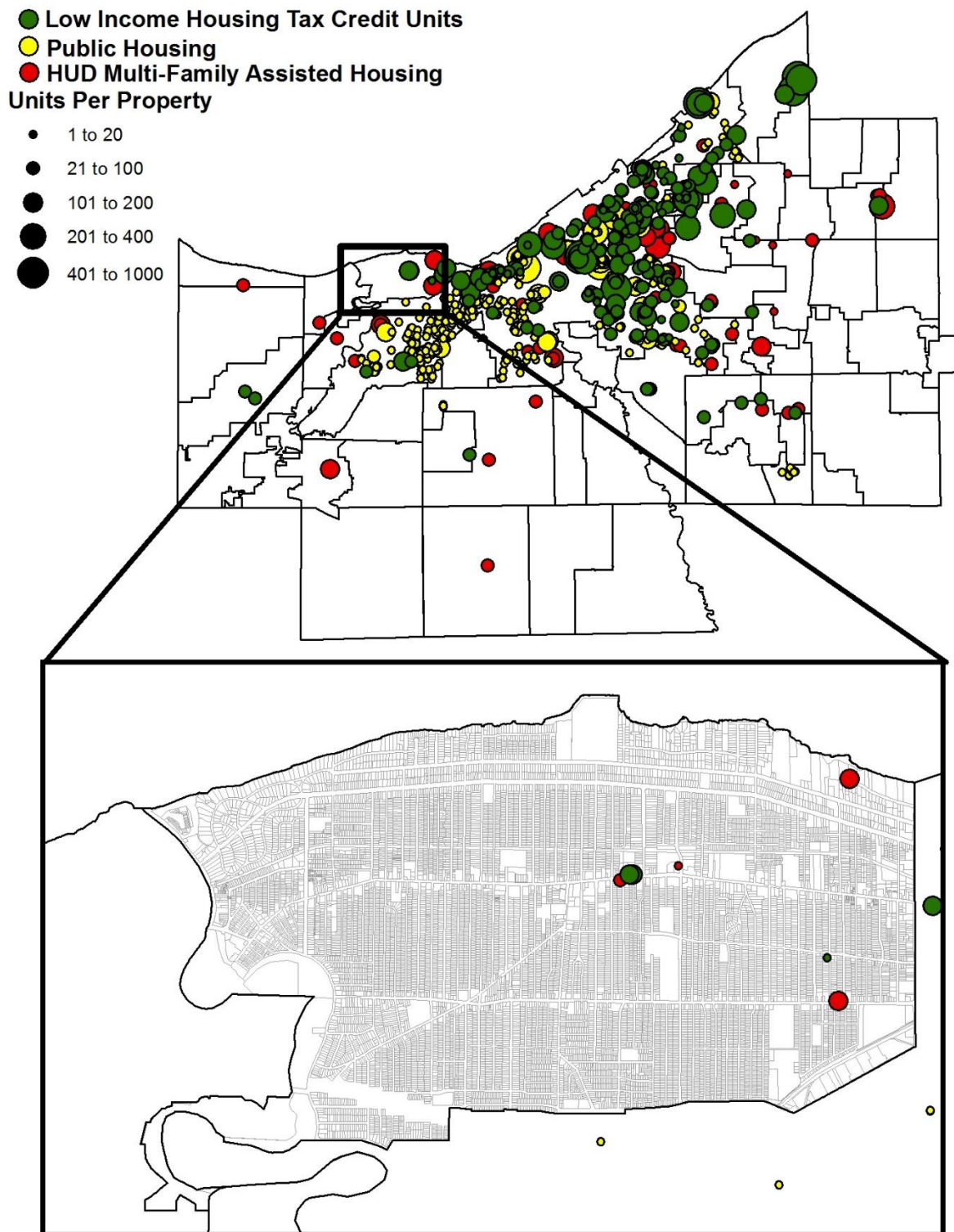
(Source: Picture of Subsidized Households, 2009- 2017 and LIHTC Database 2016)

Figure 11: Federally-Assisted Housing Units by Program Category in the City of Lakewood, 2017



(Source: Picture of Subsidized Households, 2009- 2017)

Figure 12: Federally-Assisted Housing Units by Program Category in the City of Lakewood, 2018



(Source: HUD eGIS)

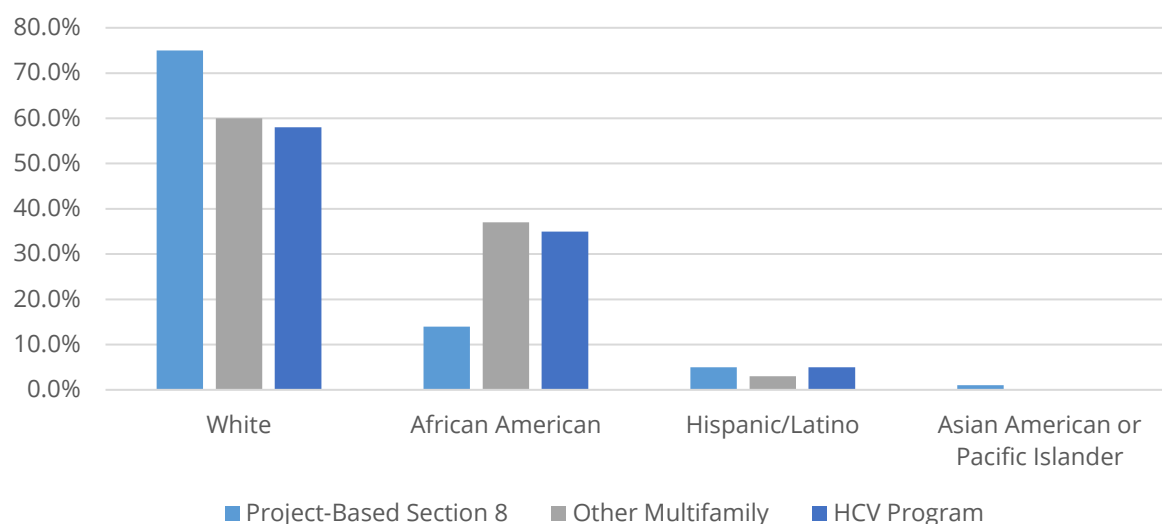
Table 27 details the residents of housing programs by race and ethnicity in the City of Lakewood. The data shows that the majority of households utilizing federally-assisted housing in the City of Lakewood are white households: 75.0% of households in project-based Section 8 units are white and 58.0% of households in HCVP units are white (see Figure 13). African American households account for 14.0% of households in Lakewood’s project-based Section 8 housing and 35.0% of households utilizing HCVP units. Three percent of households in project-based Section 8 units are Hispanic/Latino and five percent of HCVP households are Hispanic/Latino in Lakewood. Sixty percent of households in other multi-family federally-assisted housing are white, 37.0% are African American, and 3.0% are Hispanic/Latino.

Table 27: Federally-Assisted Housing Residents by Race & Ethnicity in the City of Lakewood, 2017

	White		African American		Hispanic/Latino		Asian American or Pacific Islander	
Housing Type	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Public Housing	N/A	N/A	0	0.0	N/A	N/A	N/A	N/A
Project-Based Section 8	366	75.0	68	14.0	25	5.0	5	1.0
Other Multifamily	29	60.0	18	37.0	1	3.0	0	0.0
HCV Program	188	58.0	113	35.0	16	5.0	0	0.0
City of Lakewood	21,514	87.3	1,655	6.7	685	2.8	324	1.3

(Source: Picture of Subsidized Households, 2009-2017)

Figure 13: Federally-Assisted Housing Residents by Race & Ethnicity in the City of Lakewood, 2017



(Source: Picture of Subsidized Households, 2009-2017)

Table 28 outlines the demographics of federally-assisted housing in Lakewood. Nearly all of the project-based Section 8 units are occupied with white elderly occupants (99.0% elderly, 75.0% white), with 16.0% of all households in this program having a member of the family with a disability (see Figure 14). Only 14.0% of households using project-based Section 8 housing are African American and 5.0% are

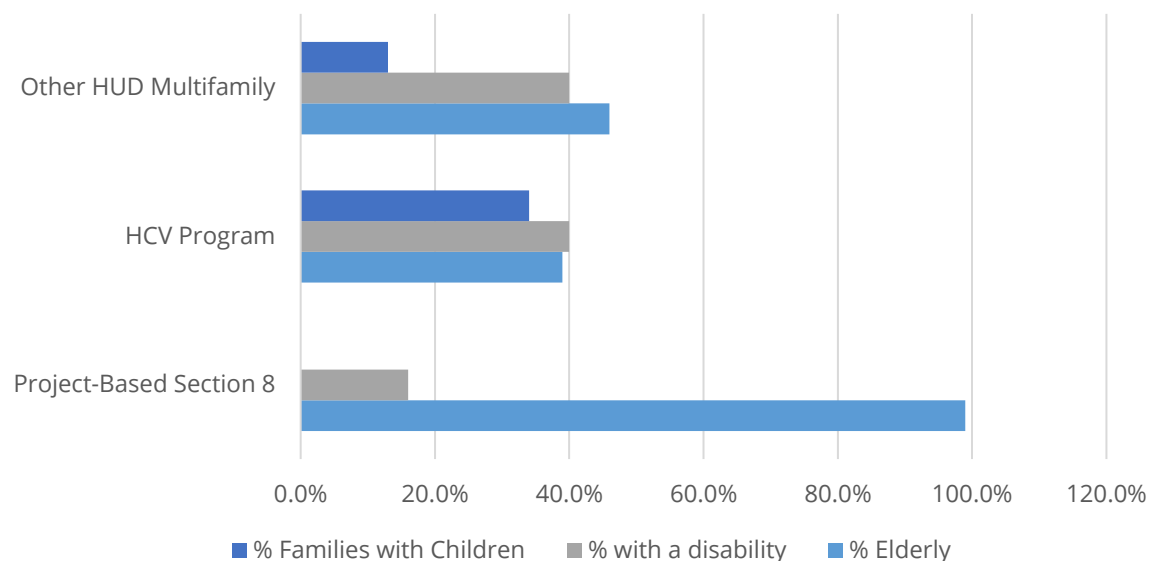
Hispanic/Latino. Families with children account for 0.0% of households in project-based Section 8 housing because all existing project-based Section 8 housing is for seniors. White households account for 58.0% of households in the HCV program in Lakewood. African American households comprise 35.0% and Hispanic/Latino households make up 5.0%. Families with children account for 34.0% of households utilizing the HCV program in Lakewood; thirty-nine percent (39.0%) of households are elderly and 40.0% of households have a member of the family with a disability. White households account for 60.0% of other HUD multifamily program residents and 46.0% are elderly. Thirty-seven percent of multifamily program households are African American, 3.0% are Hispanic/Latino, 40.0% have a member of the family with a disability, and 13.0% are families with children.

Table 28: Demographics of Federally-Assisted Housing by Program Category, City of Lakewood, 2017

	Total # of units	% Elderly	% with a disability	% White	% African American	% Hispanic/Latino	% Asian American or Pacific Islander	% Families with Children
Public Housing	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Project-Based Section 8	488	99.0	16.0	75.0	14.0	5.0	1.0	0.0
Other HUD Multifamily	48	46.0	40.0	60.0	37.0	3.0	0.0	13.0
HCV Program	324	39.0	40.0	58.0	35.0	5.0	0.0	34.0

(Source: Picture of Subsidized Households, 2009-2017)

Figure 14: Demographics of Federally-Assisted Housing by Program Category, City of Lakewood, 2017



(Source: Picture of Subsidized Households, 2009-2017)

Table 29 shows that census tract 1606.01 has the greatest total number of federally-assisted housing in Lakewood at 222 units, 166 of which are project-based Section 8 units and 56 are HCVP units. The census tract with the greatest number of project-based Section 8 units is census tract 1606.01. Census tract 1618 has the greatest number of other HUD multifamily units at 23 units. Census tract 1605 has the greatest number of HCVP units at 67 units.

Table 29: Federally-Assisted Housing Units by Program Category and Census Tract in the City of Lakewood, 2017

Census Tract	Total Federally-Assisted Housing Units	Public Housing	Project-Based Section 8	Other Multi-Family	HCVP
1601	0	0	0	0	0
1602	10	0	0	0	10
1603	7	0	1	0	6
1604	3	0	0	0	3
1605	182	0	104	10	67
1606.01	222	0	166	0	56
1606.02	41	0	0	0	41
1607	4	0	1	0	3
1608	0	0	1	0	0
1609	10	0	0	0	9
1610	2	0	0	0	2
1611	6	0	0	0	6
1612	25	0	0	15	9
1613	73	0	69	0	4
1614	12	0	3	0	9
1615	17	0	1	0	16
1616	168	0	145	0	23
1617	46	0	0	0	46
1618	35	0	0	23	12

(Source: Picture of Subsidized Households, 2009-2017)

G. Housing Choice Voucher Program in Cuyahoga County

The Housing Choice Voucher Program, formerly the “Section 8 Program,” was created to expand access to housing for low-income households by providing a rental subsidy that allows them to find housing in the private rental market, but in Cuyahoga County, the Housing Choice Voucher Program contributes to racial segregation.²¹ The Cleveland-Elyria Metropolitan Statistical Area is the fifth most racially segregated urban

²¹ Lenore Healy and Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016), 47. <http://www.thehousingcenter.org/wp-content/uploads/2016/02/Cuyahoga-County-Voucher-Mobility-Report.pdf>

region in the United States.²² One in seven African American households that rent in Cuyahoga County uses a housing voucher (15,519 households in 2017).²³ Accessing low-poverty neighborhoods improves the lives of people with low incomes. When HCVP participants have been able to move into low-poverty neighborhoods, they were able to raise their incomes, employment rates, and showed better physical and mental health outcomes.²⁴ Children who moved from a high-poverty to a low-poverty neighborhood have been shown to achieve better educational attainment and have a higher income later in life.²⁵

When surveyed, many HCVP participants in Cuyahoga County expressed a desire to move to neighborhoods with low crime and high-performing schools, often mentioning the “suburbs” as a preferred destination. For HCVP participants, the most (79.3%) reported obstacle to moving is that housing providers legally (in most jurisdictions) refuse to accept housing vouchers (Linndale, South Euclid, University Heights, and Warrensville Heights prohibit housing providers from refusing housing vouchers).²⁶

The Cuyahoga Metropolitan Housing Authority (CMHA) is the largest housing authority in Cuyahoga County, managing the largest housing choice voucher program (HCVP). Throughout Cuyahoga County, CMHA’s HCV program services 14,463 households as of January 2016. Nearly thirty-six percent of participants are households with children, 16% are seniors, and 47.9% are either people with disabilities or individuals. Of the families with children, 97.4% are female-headed households. The average annual income per households is \$11,302.²⁷

In 2016, 369 housing choice vouchers (issued by CMHA) were being utilized in the City of Lakewood. In Lakewood, 60.7% of all HCVP households are female-headed households and 48.2% of households are headed by individuals who have a disability (see Table 30). Nearly 35% (34.7%) of HCVP heads of households in Lakewood are age 62 or older. Nearly 22% (21.8%) of HCVP household members are children under 18 in Lakewood. African American HCVP households account for 41.5% of CMHA HCVP households in Lakewood and Hispanic/Latino HCVP households comprise 6.0% of CMHA HCVP households in Lakewood.

²² Population Studies Center, “New Racial Segregation Measures for Large Metropolitan Areas: Analysis of the 1990-2010 Decennial Census,” University of Michigan <http://www.psc.isr.umich.edu/dis/census/segregation2010.html> (accessed October 29, 2018).

²³ United States Department of Housing and Urban Development, “Picture of Subsidized Households:” <https://www.huduser.gov/portal/datasets/assthsg.html> (Accessed October 29, 2018).

²⁴ Turner, Margery Austin, Austin Nichols, and Jennifer Comey, “Benefits of Living in High-Opportunity Neighborhoods: Insights from the Moving to Opportunity Demonstration,” Washington, DC: Urban Institute (2012).

²⁵ Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz, “The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment,” *American Economic Review* vol. 106 no. (2016), 855–902.

²⁶ Lenore Healy and Michael Lepley, “Housing Voucher Mobility in Cuyahoga County,” Housing Research & Advocacy Center (February 2016), 37.

²⁷ CMHA HCVP Demographics, January 2016 Report.

Table 30: Cuyahoga Metropolitan Housing Authority Housing Choice Program Vouchers in Use in the City of Lakewood, 2016

CMHA Voucher Holders in Lakewood	Number	Percentage
Female-Headed Households	224	60.7
Households Headed by People with Disabilities	178	48.2
African American	153	41.5
Hispanic/Latino	23	6.0
Elderly-Headed Households	128	34.7
Household Members that are Children under the age of 18	123	21.8

(Source: CMHA HCVP Demographics, January 2016 Report)

Table 31 outlines the primary source of income for HCVP heads of household in the City of Lakewood. Sixteen percent of voucher holders in Lakewood are employed and 16.3% receive SSDI as their primary source of income. Nearly 40% of voucher holders in Lakewood (39.8%) receive social security retirement income as their primary source of income. The average family income for voucher households in Lakewood is \$11,904.

Table 31: Cuyahoga Metropolitan Housing Authority HCVP Participant Primary Source of Income in the City of Lakewood, 2016

CMHA Voucher Holder Source of Income	Percentage
Employment	16.0
SSDI	16.3
Social Security	39.8

(Source: CMHA HCVP Demographics, January 2016 Report)

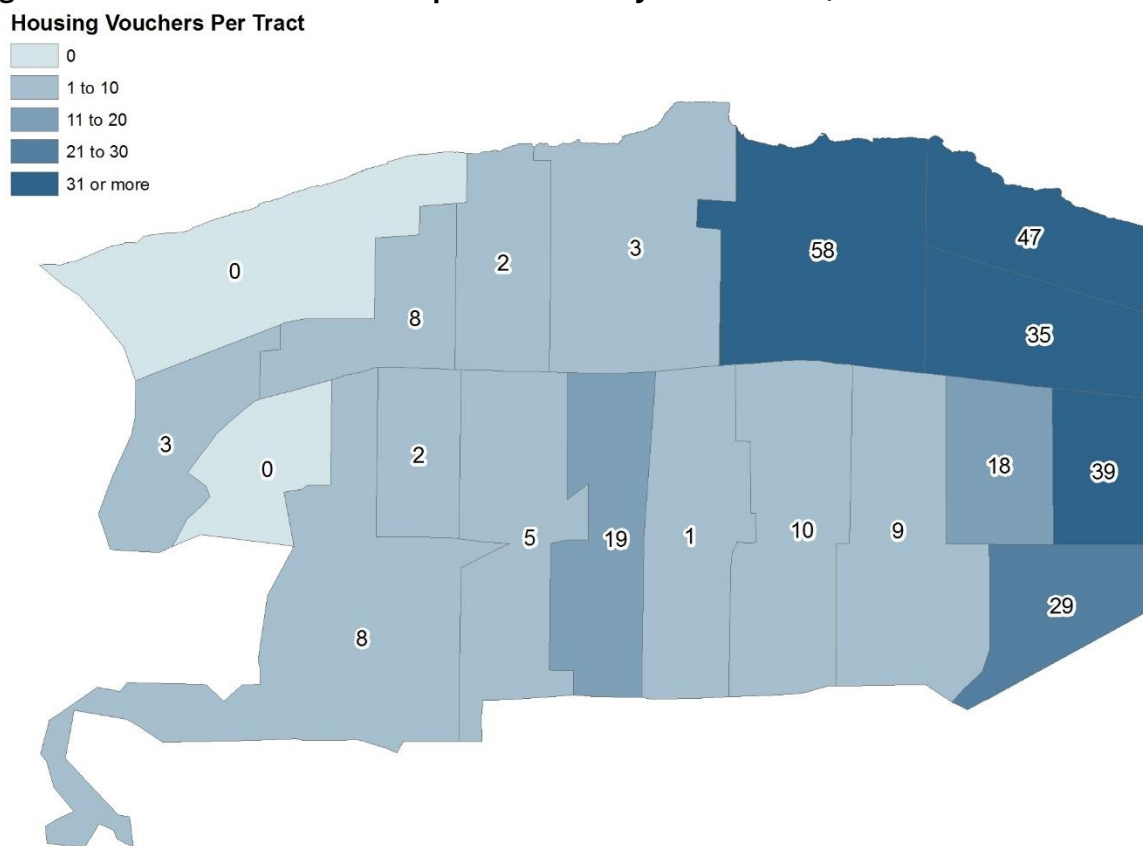
Relative to the quantity and affordability of its rental stock, the City of Lakewood is home to very few participants of the Housing Choice Voucher Program. At the time of the City's last AI, 391 households using housing vouchers lived in Lakewood.²⁸ That number has fallen 24.2% to 296 housing voucher participants by 2018. Lakewood contains 6.1% of the rental stock in Cuyahoga County and (in 2018) just 1.9% of the housing vouchers.²⁹ Families with children using a housing voucher are less likely to move into Lakewood. In 2018, 79.9% of all households using a CMHA housing voucher in Lakewood were one-person households (see Figure 15) and the average household size for voucher program participants in Lakewood

²⁸ Planning/Communications, "Lakewood, Ohio: Analysis of Impediments to Fair Housing Choice 2011" (August, 2011), 63.

²⁹ United States Census Bureau, Tenure, 2012-2016 American Community Survey 5-Year Estimates. United States Department of Housing and Urban Development, "Picture of Subsidized Households," 2017.

was 1.3 persons.³⁰ In 2016, the average CMHA household was 2.3 persons and 35.9% had children under 18.³¹

Figure 15: Location of HCVP Participants in the City of Lakewood, March 2018



(Source: City of Lakewood and Cuyahoga Metropolitan Housing Authority)

Research by The Fair Housing Center has shown that housing providers renting units affordable to HCVP participants in Cuyahoga County, but outside of neighborhoods that already have a concentration of housing vouchers (including most of Lakewood), refused to accept housing vouchers 91.2% of the time. This report showed that, in Lakewood, housing providers refused to accept housing vouchers 92.9% of the time for units that would be affordable to a person using a housing voucher.³² Landlords in the City of Lakewood perpetuate racially segregated living patterns in Cuyahoga County by refusing to accept housing vouchers.

³⁰ Cuyahoga Metropolitan Housing Authority, "HCVP Quarterly Report-Lakewood OH (March 2018)," data provided to the City of Lakewood.

³¹ Cuyahoga Metropolitan Housing Authority, "Demographics as of January 2, 2016: Housing Voucher Program."

³² Michael Lepley & Lenore Mangiarelli, "Housing Voucher Discrimination and Race Discrimination in Cuyahoga County," Housing Research & Advocacy Center (December 2017), 18, 26. <http://www.thehousingcenter.org/wp-content/uploads/2017/12/Voucher-and-Race-Discrimination.pdf>

A rental ad analysis conducted for Lakewood's 2011 AI showed that housing providers advertised that they did not accept housing vouchers in 1 out of 10 ads.³³ In 2018, The Fair Housing Center reviewed rental ads for units in the City of Lakewood and found that housing providers advertised that they will not accept housing vouchers in 10.2% of ads. The Housing Choice Voucher Program, formerly the "Section 8 Program," carries a racialized stigma based on widely-held stereotypes, and "No Section 8" can serve as proxy for race-based housing discrimination.³⁴ The Fair Housing Center report showed that housing providers who advertise that they do not accept housing vouchers were more likely to treat black renters (without vouchers) unfavorably than white renters (also not using vouchers) compared to housing providers who did not discriminate against vouchers in their ads.³⁵

The City of Lakewood, in its Fair Housing Action Plan responding to its 2011 AI, reported to HUD that it would "monitor housing ads and penalize discrimination against housing subsidy recipients," but representatives of the City of Lakewood later determined they did not have the legal authority to pursue such an action.³⁶

³³ Planning/Communications, "Lakewood, Ohio: Analysis of Impediments to Fair Housing Choice 2011" (August, 2011), 78.

³⁴ Emily Badger, "How Section 8 Became a Racial Slur: A History of Public Housing in America," *Washington Post*, June 15, 2015.

Martha M. Galvez, "What Do We Know About Housing Choice Voucher Program Location Outcomes?" Urban Institute (2010).

Paula Beck, "Fighting Section 8 Discrimination: The Fair Housing Act's New Frontier," *Harvard Civil Rights-Civil Liberties Review* vol. 31 (1996), 155-186.

³⁵ Michael Lepley & Lenore Mangiarelli, "Housing Voucher Discrimination and Race Discrimination in Cuyahoga County," Housing Research & Advocacy Center (December 2017), 13.

³⁶ City of Lakewood, "Fair Housing Action Plan: Lakewood, Ohio," <http://www.onelakewood.com/wp-content/uploads/2017/06/Fair-Housing-Action-Plan-Lakewood-OH.pdf>

VIII. EDUCATION

Access to high-quality public schools can be dictated by a household's capacity to afford housing in neighborhoods that are close to good schools. In order to attract new families and encourage families with children to remain in the suburb, a high-quality school district is essential. Within Lakewood, 80.9% of school-aged children attend public school and 19.1% attend private school (from pre-school through Grade 12).³⁷ There is one public school district in Lakewood, Lakewood City School District. The school district operates one high school, two middle schools, and seven elementary schools. Table 32 outlines the district's State Report Card ratings for the 2017-2018 academic school year. The State of Ohio's report card designates an A, B, C, D, or F as its grading system for each district. Of the 11 schools in Lakewood, no school received a Performance Index Grade of "A", 6 received "B", 3 received a rating of "C", 1 received a rating of "D", and 1 received a rating of "F". The overall Performance Index Grade for the entire district was C.

Table 32: Lakewood City School District Data, 2017-2018 Report Card

School	Performance Index Grade	Performance Index Score	Indicators Met Count	Indicators Applicable Count	Indicators Met Percentage
Harding Middle School	B	97.9	5	11	45.5
Garfield Middle School	C	86.1	3	11	27.3
Hayes Elementary School	B	99.6	6	9	66.7
Harrison Elementary School	D	80.6	1	8	12.5
Emerson Elementary School	C	94.8	5	9	55.6
Horace Mann Elementary School	B	98.3	4	9	44.4
Lincoln Elementary School	B	103	6	9	66.7
Lakewood High School	C	85.1	4	10	40.0
Grant Elementary School	B	103.5	6	10	60.0
Roosevelt Elementary School	B	100.4	6	9	66.7
Lakewood City Academy	F	50.9	1	12	8.3

(Source: Ohio Department of Education, 2017-2018)

In 2017, white students comprised the majority of students in Lakewood City Schools at 72.6% (see Table 33). African American students make up 7.7% of the student population and Hispanic/Latino students, 7.1%. Nearly 15% of students are individuals with disabilities and 6.6% are English learners.

³⁷ U.S. Census Bureau, Sex of School Enrollment by Level of School by Type of School for the Population 3 Years and Over, ACS 5-Year Survey, 2012-2016, Lakewood, Ohio.

Table 33: Lakewood City School District Enrollment by Subgroup (Racial/Ethnic), 2017

Subgroup	Number	Percentage
American Indian/Alaskan Native	NC*	NC
Asian American/Pacific Islander	269	5.4
African American	379	7.7
Hispanic/Latino	349	7.1
Multiracial	356	7.2
White	3,591	72.6
Students with Disabilities	728	14.7
Economic Disadvantages	2,055	41.5
English Learner	325	6.6
Migrant	NC	NC

(Source: Ohio Department of Education, 2017) *NC=Not Counted

During the 2016-2017 school year, 41.5% of students in Lakewood City Schools were classified as “economically disadvantaged” as shown in Table 34. Table 34 shows the proportion of the student population enrolled in the National School Lunch Program for free meals and those enrolled in the free or reduced-price lunch program in each school. In order to be eligible for the lunch program, households must be at or below a certain income threshold. To be eligible for free meals, children’s household incomes must be at or below 130% of the poverty level. To be eligible for reduced price lunches, the households must have incomes between 130% and 185% of the poverty level.³⁸

³⁸ Federal Register, Vol. 79, No. 43, March 2014 Notices 12467 “Child Nutrition Programs—Income Eligibility Guidelines,” Department of Agriculture Food and Nutrition Service.

Table 34: Students Who Receive Free Lunch or Reduced-Price Lunch in Lakewood City School District, 2016-2017

School	Percentage of Students that Receive Free Lunch	Percentage of Students that Receive Free or Reduced-Price Lunch
Harding Middle School	23.6	29.1
Garfield Middle School	43.6	48.6
Hayes Elementary School	30.4	36.7
Harrison Elementary School	66.4	68.9
Emerson Elementary School	37.4	42.6
Horace Mann Elementary School	36.3	40.4
Lincoln Elementary School	27.0	30.4
Lakewood High School	33.7	37.6
Grant Elementary School	29.4	31.7
Roosevelt Elementary School	38.6	43.8
Lakewood City Academy	NC	NC

(Source: Ohio Department of Education, 2016-2017)

IX. TRANSPORTATION

Access to transportation can have a significant impact on a household's housing choice; availability of transportation can affect where a household chooses to live as well as proximity to good schools and employment opportunities. Throughout the Cleveland metropolitan area, the Greater Cleveland Regional Transit Authority (RTA) is the primary source of public transit and services much of the Lakewood suburb through busing and the Rapid rail. The City of Lakewood provides vans to transport Lakewood residents to the Senior Center, for recreation and social events and for medical appointments in western Cuyahoga County. Lakewood is a walkable city, with over 180 miles of sidewalks and 90 miles of streets. The city is served by six bus lines and two rapid rail stations.³⁹

Table 35 shows that 79.1% of the Lakewood population drive alone to work and 7.2% carpool. Five percent of the population utilizes public transport and 2.8% walk to work. Almost 4.0% of the population (3.8%) works from home. Lakewood has a score of 38 per the website, walkscore.com. Walk score analyzes how pedestrian-friendly an area is based upon the number of amenities within walking distance of most housing.

Table 35: Means of Transportation to Work in the City of Lakewood, 2016

Means of Transportation	Number	Percent
Drove Alone	23,026	79.1%
Carpooled	2,083	7.2%
Public Transportation	1,510	5.2%
Walked	818	2.8%
Other Means	574	1.9%
Worked at Home	1113	3.8%

(Source: 2016 American Community Survey 5-Year Estimates)

³⁹ City of Lakewood website, "Housing," <http://www.onelakewood.com/>.

X. HOUSING DISCRIMINATION

A. Complaints

The federal Fair Housing Act affords individuals who have experienced housing discrimination three options for filing their complaint: 1) filing an administrative complaint with the U.S. Department of Housing and Urban Development (HUD), 2) filing a lawsuit in court, or 3) filing both the administrative complaint and a lawsuit in court. According to Ohio fair housing law, individuals are permitted to pursue remedies administratively with the Ohio Civil Rights Commission (OCRC) or in court. Ohio's fair housing law has been designated as substantially equivalent to the federal statute. In Lakewood, most housing discrimination complaints filed with HUD are referred to the OCRC to investigate and pursue potential resolution. The OCRC not only investigates cases referred by HUD, but also accepts complaints filed directly with the agency.⁴⁰

Upon receiving a charge, the OCRC assigns it to an investigator, who researches the complaint and speaks with the parties and witnesses. The investigator reviews any available documentation to determine if there is probable cause of discrimination in the case. Upon receipt of the complaint, the OCRC offers the parties the opportunity to voluntarily mediate their dispute. If both parties agree, a mediator meets with both parties to identify a mutually satisfactory resolution. If no settlement is reached, the case continues in the investigation.⁴¹

Once the investigator has reached a recommendation on the case, it is submitted for supervisory approval and given to the Commissioners, who must approve the report becoming a final OCRC determination. Based upon the review of the report and recommendation of the OCRC staff, the Commission determines a finding of "probable cause" or "no probable cause" of discrimination.

If the OCRC finds probable cause of discrimination, the parties are offered a final chance to resolve the issue through a conciliation process. If the dispute cannot be resolved, the case is referred to the Civil Rights Section of the Ohio Attorney General's Office to bring civil action before an administrative law judge, or in state court, if the parties request.

Cases filed with HUD and the OCRC are entered into the HUD Enforcement Management System (HEMS) database, run by HUD. Over the last ten years, according to HUD data, fair housing complaints in the City of Lakewood have ranged from a low of 2 complaints (in 2011 and 2012) to a high of 10 complaints (in 2014), with an average of 4.9 complaints per year (see Table 36 and Figure 16). From 2005 to 2018, the majority of complaints have been filed on the bases of disability (19 complaints, or 27.9%), race (18 complaints, or 26.5%), and familial status (9 complaints, or 13.2%), followed by sex (8 complaints, or 11.8%), retaliation (7 complaints, or 10.3%), national origin (5 complaints, or 7.4%), and religion (2 complaints, or 2.9%).

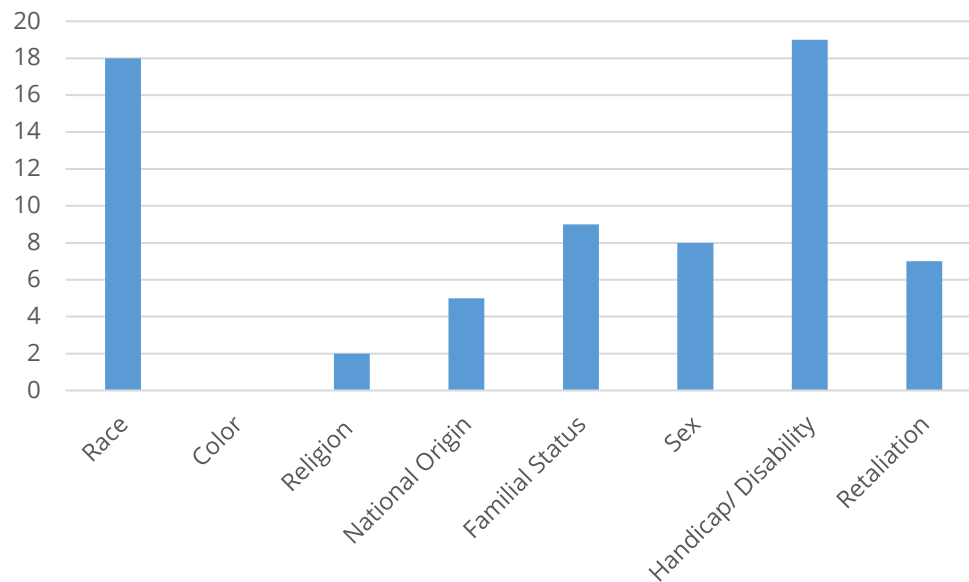
⁴⁰ OCRC procedures are established in OCRC 4112.03-4112.06 and in the Ohio Administrative Code 4112-3-01 through 4112-3-17.

⁴¹ The OCRC has the authority to demand access to records, documents, premises, evidence or possible sources of evidence, and to record the testimony or statements from individuals. The agency also has the right to issue subpoenas, interrogatories, cease and desist orders, hold public hearings, and collect monetary benefits.

Table 36: Fair Housing Complaints Filed with HUD in the City of Lakewood, 2005-2018

	Race	Color	Religion	National Origin	Familial Status	Sex	Handicap/ Disability	Retaliation	Total
2005	2	0	0	1	0	0	1	1	5
2006	1	0	0	0	1	0	1	1	4
2007	3	0	0	0	0	1	2	0	6
2008	1	0	0	0	1	0	1	0	3
2009	2	0	0	0	2	1	0	0	5
2010	1	0	0	1	2	2	1	1	8
2011	0	0	0	0	1	1	0	0	2
2012	0	0	0	0	1	0	1	0	2
2013	2	0	1	0	0	0	3	1	7
2014	2	0	1	0	1	2	3	1	10
2015	1	0	0	0	0	0	2	1	4
2016	0	0	0	2	0	0	1	1	4
2017	1	0	0	0	0	0	2	0	3
2018	2	0	0	1	0	1	1	0	5
Total	18	0	2	5	9	8	19	7	68

(Source: HUD HEMS Data. Data for the year of 2018 is as of 5/18/2018)

Figure 16: Fair Housing Complaints Filed with HUD in the City of Lakewood, 2005-2018

(Source: HUD HEMS Data. Data for the year of 2018 is as of 5/18/2018)

B. Fair Housing Services

Controlled testing for housing discrimination is a well-recognized and effective way to determine the extent of discrimination within a given geography as well as provide evidence as to whether a housing provider violated fair housing laws. There are two types of fair housing testing:

- 1) Systemic testing that measures broader trends of discrimination within a given geography and
- 2) Complaint-based testing, which is done in response to a complaint to gather further evidence as to whether a housing provider violated fair housing law.

The majority of fair housing testing is conducted as controlled matched-pair testing. This testing methodology, which is recommended by the U.S. Department of Housing and Urban Development, is used throughout the United States in rental, sales, insurance, and mortgage lending testing. In this testing method, two trained testers are given nearly identical profiles and are instructed to approach a housing provider to either rent, purchase, or obtain homeowners insurance or a mortgage loan. One tester is given a profile belonging to a protected class under the Fair Housing Act; however, both testers are not aware of which tester is the protected class tester and which is the control, or non-protected class, tester. Following the test, each tester documents their experience and submits a written report to the test coordinator, who evaluates the reports and makes the initial determination as to whether it is probable that discrimination occurred. Some tests require follow-up testing to corroborate an initial probable cause finding or to clarify inconclusive results.

In the City of Lakewood, the Fair Housing Center for Rights & Research has been the primary agency conducting fair housing testing. The City of Lakewood has annually contracted with The Fair Housing Center since 2005 to conduct testing, process fair housing complaints, and provide landlord education on fair housing law. During this time period, The Fair Housing Center conducted 310 rental tests, 82 sales tests, and five insurance tests (including re-tests) through these contracts and investigated 31 complaints from Lakewood residents or potential residents. Table 37 shows the breakdown in the number of rental tests by basis. From 2007-2018, The Fair Housing Center conducted 23 fair housing trainings, educating 1,799 attendees, and 4 fair housing presentations at family collaborative meetings in the City of Lakewood.

Table 37: Fair Housing Center Rental Tests by Basis, City of Lakewood, 2005-2018

Race	National Origin	Disability	Familial Status	Sexual Orientation	Gender
194	20	28	66	1	1

(Source: FHCRR Data. Data for the year 2018 is as of 11/27/2018)

The Fair Housing Center evaluates each test result as “probable cause,” “no probable cause,” or “inconclusive.” From 2005 through 2018, The Fair Housing Center’s testing in the City of Lakewood found probable cause of discrimination in 15.1% of cases, compared to 51.9% that found no probable cause and 15.4% that were inconclusive.

Table 38 shows the number of agency charges by basis that were filed either with HUD or the OCRC by The Fair Housing Center and the letters sent to housing providers by basis over the last decade and a half. The table also shows allegations received from the public against housing providers with potentially discriminatory practices in Lakewood by basis from 2005-2018. The Fair Housing Center filed agency

charges with HUD or OCRC on the following bases: race (5), national origin (2), disability (4), familial status (19), and sex (1). The Fair Housing Center sent letters to offending housing providers on several bases: race (1), national origin (1), disability (3), and familial status (9). The Fair Housing Center received 161 allegations⁴² from the public against Lakewood housing providers on the following bases: race (36), national origin (5), disability (83), familial status (19), sex (16), age (4), religion (1), retaliation (10), criminal history (2), military status (4), source of income (1), association with a protected class (1), sexual orientation (6), gender identity (2), and domestic violence (1). From 2005 to 2010, all fair housing complaints made directly to the City of Lakewood were referred to The Fair Housing Center, OCRC, or HUD. From 2011 to 2017, there have been several fair housing complaints a year on the bases of sexual orientation and gender identity made directly to the City of Lakewood; upon receiving these complaints, the City of Lakewood initiated the internal complaint process. The City of Lakewood did not provide records of complaints made on the bases of sexual orientation and gender identity made directly to the City; the City did not reach a determination of probable cause in the complaints received on these bases.

Table 38: Fair Housing Center Agency Charges Filed, Letters Sent, and Received Allegations by Basis, City of Lakewood, 2006-2018

Basis	FHCRR Agency Charges (Filed with HUD/OCRC)	Letters Sent to Housing Providers	Received Allegations from the Public
Race	5	1	36
National Origin	2	1	5
Disability	4	3	83
Familial Status	19	9	19
Sex	1	0	16
Age	0	0	4
Religion	0	0	1
Retaliation	0	0	10
Marital Status	0	0	0
Criminal History	0	0	2
Military Status	0	0	4
Source of Income	0	0	1
Association with a Protected Class	0	0	1
Sexual Orientation	0	0	6
Gender Identity	0	0	2
Domestic Violence	0	0	1

(Source: FHCRR Data. Data for the year 2018 is as of 10/30/2018)

⁴² Allegations can be made on multiple bases. Table 38 presents allegations by each basis, meaning that for one complaint with two bases (e.g. one complaint on the bases of race and disability), each basis was counted as a separate allegation in the table. Thus, the table shows a greater number of allegations by each basis than the total number of allegations.

C. Sexual Orientation and Gender Identity Housing Discrimination

Within Cuyahoga County, housing discrimination against the Lesbian, Gay, Bisexual, Transgender, and Queer (LGBTQ) community is a pervasive problem. Such discriminatory practices adversely impact quality of life, safety, and educational and economic opportunities. The Fair Housing Center conducted a study in 2016 that showed housing discrimination on the basis of sexual orientation in 35.2% of rental transactions using both email tests (discrimination in 12.5% of tests) and in-person tests (discrimination in 55.5% of tests). The Fair Housing Center uncovered housing discrimination on the basis of gender identity 32.1% of the time in email tests only. The Fair Housing Center was unable to complete on-site tests on the basis of gender identity, but based on the increased rate of discrimination between email and in-person on the basis of sexual orientation it is likely that people who identify as transgender experience housing discrimination at a much higher rate. Although the federal Fair Housing Act and Ohio fair housing law do not explicitly protect LGBTQ people from housing discrimination, the U.S. Department of Housing and Urban Development (HUD) has expanded fair housing policy to recognize housing discrimination on the basis of non-conformity with gender stereotypes as sex discrimination. Within Cuyahoga County, 18 municipalities have enacted fair housing ordinances banning housing discrimination on the basis of sexual orientation and 13 have done so on the basis of gender identity. In June 2018, Cuyahoga County Council established Ordinance 02018-009, enacting Chapter 206.13: Commission on Human Rights and Title 15: Anti-Discrimination to ensure equal opportunity and treatment for all citizens of Cuyahoga County including on the bases of sexual orientation and gender identity. The City of Lakewood does protect people from housing discrimination on the bases of sexual orientation and gender identity through Lakewood's Human Rights Ordinance.

XI. MORTGAGE LENDING AND FORECLOSURES

A. Mortgage Lending

Before the Fair Housing Act of 1968, many lending institutions engaged in lawful discriminatory practices against racial and ethnic minorities. This included denial of loans on the basis of race as well as the practice of “redlining,” which denied access to mortgage credit to individuals of any race who lived in neighborhoods where there was a presence of residents of color. Neighborhoods of color were thus disinvested in by lack of access to credit, as determined by lenders who mapped priority investment areas versus areas to avoid all investment (redlined neighborhoods) and contributed to regional segregation as white residents fled to all-white neighborhoods where lenders would make mortgages. Mortgage lenders also engaged in predatory lending practices that specifically targeted racial and ethnic minorities. These included loans with higher interest rates or unfair terms, and had the effect of eliminating the accumulated wealth of racial and ethnic minorities and their communities. The Fair Housing Act made such practices illegal; however, studies have shown in recent decades that disparities persist in mortgage lending throughout Ohio based upon race.

The Fair Housing Center analyzed both 2015 and 2016 mortgage lending data (the most recent available as of September 2017) to assess whether disparities in lending existed in Lakewood. Home Mortgage Disclosure Act (HMDA) data was reviewed, focusing on two particular aspects: 1) home purchase loan originations and 2) home purchase loan denials by race, ethnicity, and income.

HMDA requires that lenders provide data on the disposition of the application; the purpose, type, and characteristics of each home mortgage that lenders originate or purchase; loan pricing information; the census-tract designations of the properties that are related to those loans; the demographic information of the loan applicants, including race, ethnicity, and income; and the information about the loan sales.⁴³ Evaluating denial rates can reveal whether individuals of different races and ethnicities have fair access to credit to purchase a home.

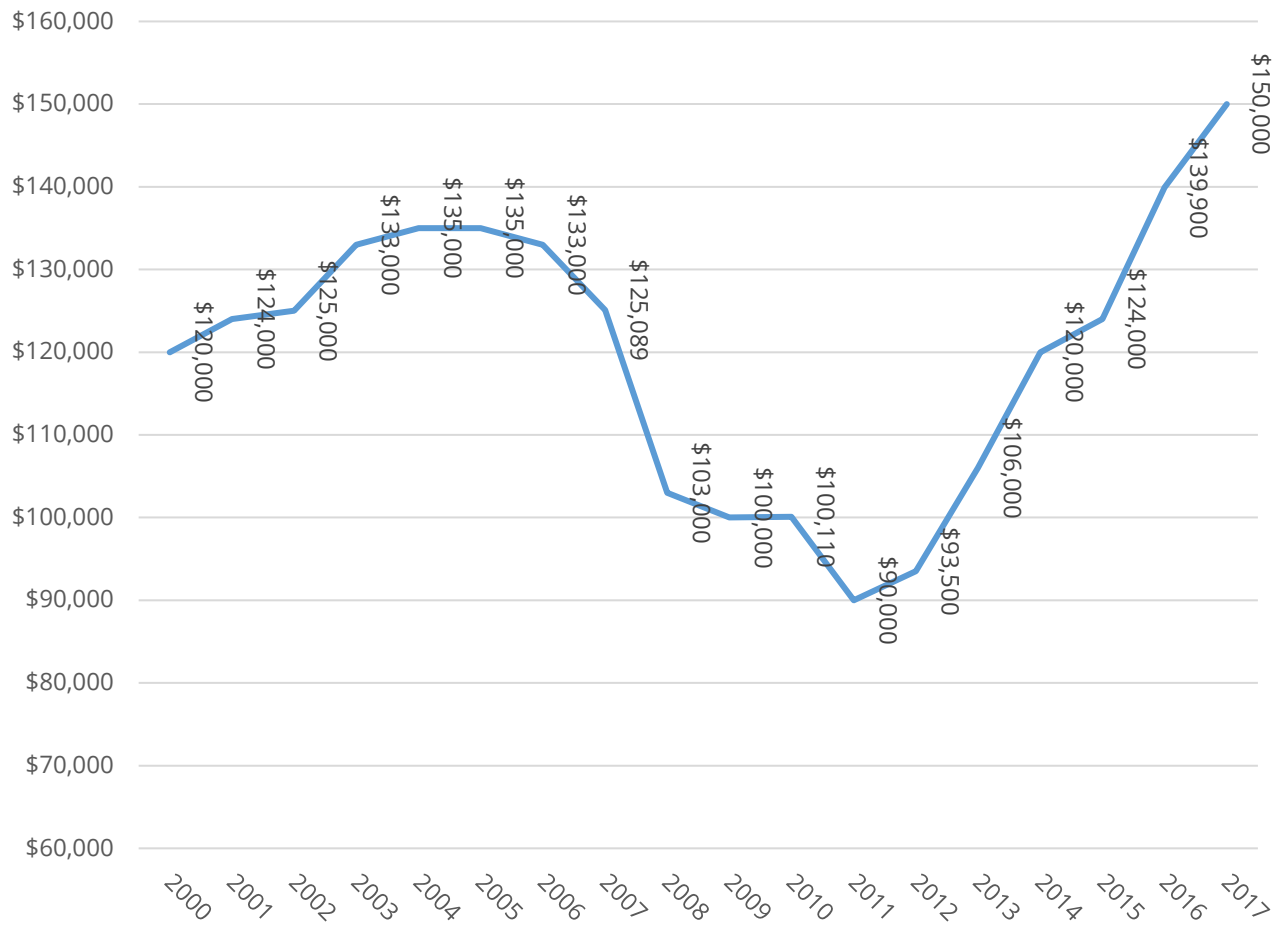
The following racial categories were examined in the analysis: African Americans, whites, Asian Americans, and Hispanics/Latinos. The tables show low-, moderate-, middle-, and upper-income class data for the number of loan originations for home purchase and the rates of denial for home purchase. The income classes are labeled by percentage of the MSA median income; low-income is below 50%, moderate is 50-79.99%, middle is 80-119.99%, and upper is $\geq 120\%$.

Housing values in Lakewood are rising rapidly. From the time of the City of Lakewood’s previous AI (2011) to 2017, the median home sale price for single-family homes rose 66.6% (\$90,000 to \$150,000: see Figure 17).⁴⁴ Lakewood has more than recovered from the mortgage crisis of the 2000s. Lakewood has seen some of the fastest growing property values in Cuyahoga County. During the 2018 Cuyahoga County property reappraisal, the total assessed value of residential parcels in Lakewood increased by 22.5%, the highest increase for any municipality in Cuyahoga County (see Figure 18).

⁴³ Federal Reserve Bulletin: 2016 HMDA Data, Accessed November 12, 2018: https://www.federalreserve.gov/pubs/bulletin/2016/pdf/2015_HMDA.pdf

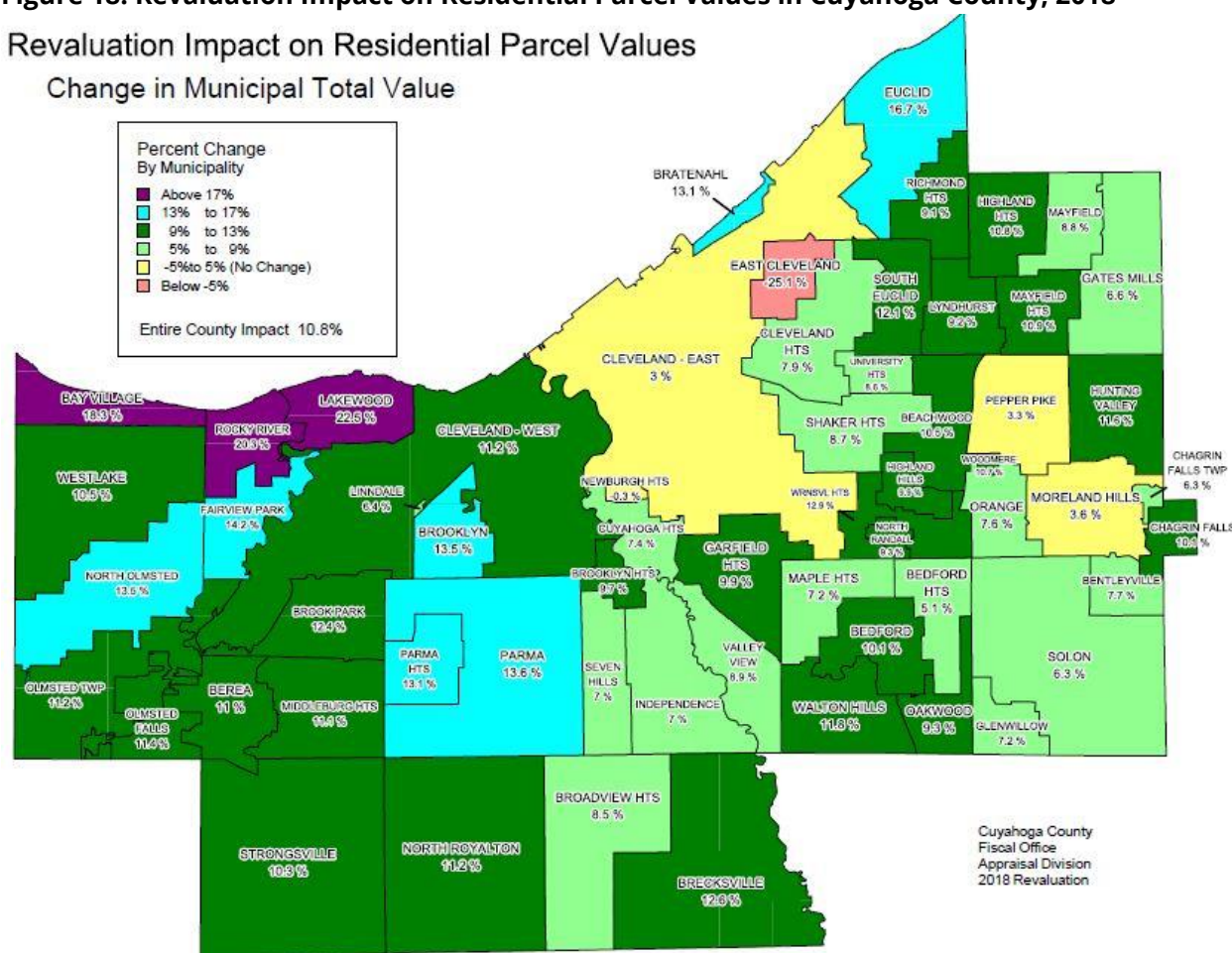
⁴⁴ Frank Ford, “Housing Market Recovery in Cuyahoga County: Race and Geography Still Matter,” Western Reserve Land Conservancy (July 22, 2018), 36

Figure 17: Median Home Purchase Sale Prices in the City of Lakewood, 2000 to 2017



(Source: Frank Ford, "Housing Market Recovery in Cuyahoga County: Race and Geography Still Matter," Western Reserve Land Conservancy (July 22, 2018).

Change in Municipal Total Value



(Source: Cuyahoga County)

Rising real estate values can be good for a community, but they can also cause displacement and exclusion. Higher property taxes can price out long-term residents who can no longer afford their property taxes. They can exclude households with lower incomes, which disproportionately impacts people of color.

In Lakewood, homeownership amongst people of color is very low (see Table 16 on page 19), and it does not appear to be improving. In 2015 and in 2016, Hispanic and minority homebuyers in Lakewood made up less than 4.5% and 4.2% (respectively) of all homebuyers (see Tables 39 and 40). Representatives of social service agencies reported to The Fair Housing Center that it is becoming more difficult for their clients to buy a house in Lakewood, and some who were able to in previous years are selling and leaving the city as their housing costs rise.

Mortgage lenders are also more likely to deny borrowers of color than white borrowers in Lakewood. In 2015, Asian, Black, and Hispanic borrowers were more than twice as likely to be denied a home purchase loan than white borrowers (see Table 41). In 2016, African Americans were denied seven times more often than white borrowers and Hispanic borrowers were denied nearly three times more than white borrowers (see Table 42).

Table 39: 2015 Home Purchase Originations in the City of Lakewood by Race, Ethnicity, and Income

	Low	Moderate	Middle	Upper	Total
Asian	1	3	1	3	8
African American	1	1	1	3	6
White	19	112	155	198	484
Hispanic	0	2	2	5	9

(Source: Home Mortgage Disclosure Act Data)

Table 40: 2016 Home Purchase Originations in the City of Lakewood by Race, Ethnicity, and Income

	Low	Moderate	Middle	Upper	Total
Asian	2	3	0	2	7
African American	1	4	3	2	10
White	29	130	175	286	620
Hispanic	2	5	0	3	10

(Source: Home Mortgage Disclosure Act Data)

Table 41: 2015 Home Purchase Denials in the City of Lakewood by Race, Ethnicity, and Income

	Low		Moderate		Middle		Upper		Total
	Number Denied	Denial Rate	Number Denied	Denial Rate	Number Denied	Denial Rate	Number Denied	Denial Rate	Denial Rate
Asian	1	50.0%	1	25.0%	0	0.0%	0	0.0%	20.0%
African American	0	0.0%	1	50.0%	1	50.0%	0	0.0%	25.0%
White	11	36.7%	11	8.7%	13	7.6%	18	8.1%	9.9%
Hispanic	2	66.7%	1	33.3%	1	33.3%	0	0.0%	26.7%

(Source: Home Mortgage Disclosure Act Data)

Table 42: 2016 Home Purchase Denials in the City of Lakewood by Race, Ethnicity, and Income

	Low		Moderate		Middle		Upper		Total
	Number Denied	Denial Rate	Number Denied	Denial Rate	Number Denied	Denial Rate	Number Denied	Denial Rate	Denial Rate
Asian	0	0.0%	0	0.0%	0	0.0%	0	0.0%	0.0%
African American	1	50.0%	0	0.0%	5	62.5%	1	33.3%	41.2%
White	5	13.9%	10	7.0%	11	5.8%	13	4.2%	5.7%
Hispanic	0	0.0%	1	16.7%	0	0.0%	1	25.0%	15.4%

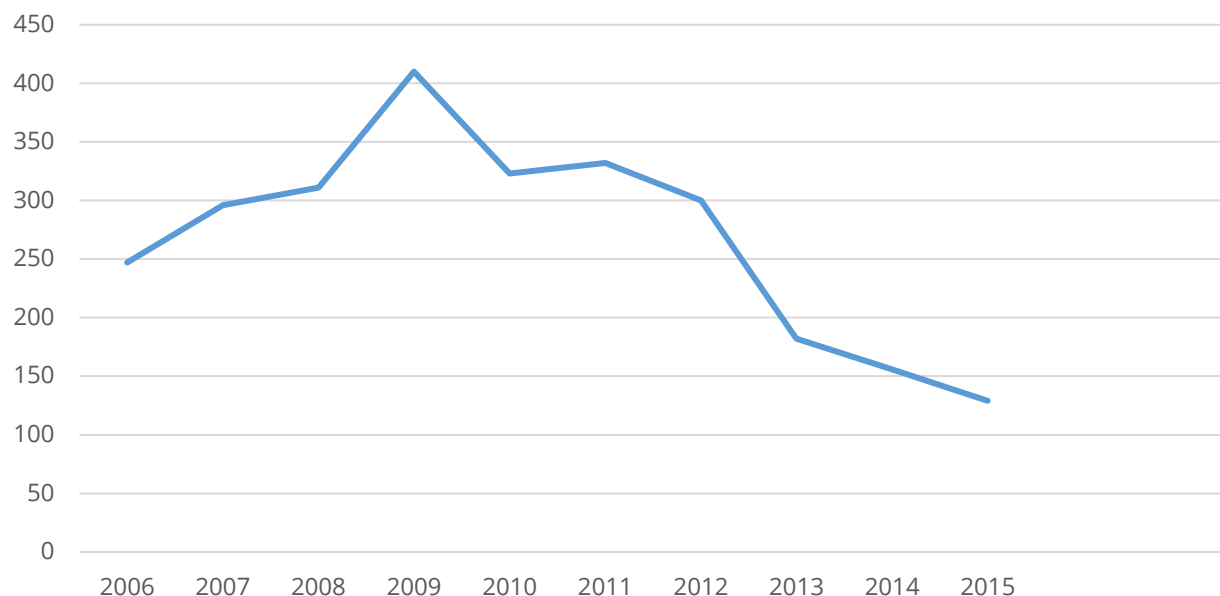
(Source: Home Mortgage Disclosure Act Data)

B. Foreclosures

Ohio is one of 12 states that saw an increase in foreclosures over the past year. Ohio has been a leader in foreclosures for over a decade due, in part, to the rise of predatory lending. Foreclosures have a devastating effect on a household's ability to save, create wealth, and maintain financial stability. Cuyahoga County leads the state with the highest number of foreclosure filings in 2017 among the ten most populous counties in Ohio (5,145 filings in 2017). There were 4.12 foreclosure filings per 1,000 people in 2017 in Cuyahoga County. The filings decreased from 2016 to 2017 by sixteen percent.⁴⁵ However, foreclosures in Cuyahoga County rose by 77% from January 2017 to January 2018. One in every 609 properties in the county had a foreclosure filing in January 2018.⁴⁶

Figure 19 outlines the number of foreclosure filings in the City of Lakewood from 2006 to 2015. Over the nine-year period measured, the peak foreclosure filings occurred in 2009 at 410, but declined by 60% from 2010-2015.⁴⁷ As shown in Table 43, the percent of parcels in Lakewood that have foreclosure filings is at its lowest (0.43%) since 2006.

Figure 19: Foreclosure Filings in the City of Lakewood, 2006-2015



(Source: Northeast Ohio Community and Neighborhood Data for Organizing, Western Reserve Land Conservancy Report, 2016)

⁴⁵ Kezia Otinkorang, "Consumer Protection and Asset Building. Still a Problem: Ohio Foreclosures, 2017," Policy Matters Ohio, August 2018.

⁴⁶ Chris Mosby, "Cuyahoga County Leads State in Foreclosure Filings," Cleveland Patch: February 2018. Accessed 11/2/2018: <https://patch.com/ohio/cleveland/cuyahoga-county-leads-state-foreclosure-filings-report>.

⁴⁷ Frank Ford, "Is the Cuyahoga Foreclosure Crisis Over? It depends on where you're standing. A Report on Housing Trends in Cuyahoga County, 1995-2015," Western Reserve Land Conservancy.

Table 43: Concentration of Mortgage Foreclosures in the City of Lakewood, 2006-2017 (Percent of Parcels with Filings)

2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
1.39	1.67	1.77	2.31	1.82	1.88	1.69	1.03	0.89	0.73	0.61	0.43

(Source: Frank Ford, "Housing Market Recovery in Cuyahoga County: Race & Geography Still Matter," Western Reserve Land Conservancy, 2018)

XII. LOCAL ORDINANCES AND POLICIES

A. City of Lakewood Rental Criminal History Policy

The City of Lakewood encourages landlords to engage in eviction and criminal background screening of prospective tenants by making such screening one of the three criteria by which a landlord may meet the City's requirements to obtain a rental housing license.⁴⁸ Since 2011, the City has had a relationship with CoreLogic SafeRent, a tenant screening service, through which it provides its landlords discounted tenant screening services. Tenant screening is a common practice among rental housing providers.

Criminal background screening may violate fair housing laws when applied inconsistently or when it disproportionately impacts one or more protected classes. The Fair Housing Act does not protect individuals who pose a direct threat to the health and safety of others or whose tenancy would result in substantial physical damage to property. Many individuals who have been convicted of felony offenses, have served prison sentences, or who are on probation or parole have been convicted of a nonviolent criminal offense and pose no threat to the health or safety of other individuals. The United States Department of Justice defines nonviolent crimes as "property, drug, and public order offenses, which do not involve a threat of harm or actual attack upon a victim."⁴⁹ Securing housing is a major barrier to reintegration into the community faced by formerly incarcerated individuals, especially those in need of supportive housing due to physical and mental health disabilities or a history of drug abuse.⁵⁰

The U.S. Department of Housing and Urban Development's Office of the General Counsel issued guidance (HUD Guidance) on the application of the Fair Housing Act standards to the use of criminal background screening in connection with a housing-related transaction in April 2016.⁵¹ The HUD Guidance notes that tenant screening which considers arrest records that do not lead to convictions or that denies housing on the basis of criminal history will have a racially and ethnically discriminatory effect due to "...widespread racial and ethnic disparities in the criminal justice system...." The HUD Guidance notes that criminal background screening may serve a legitimate, nondiscriminatory business interest, but that the burden of proof falls to the housing provider to demonstrate that a policy which may deny housing due to criminal history is, in fact, necessary to achieve this interest and that the policy assists in protecting resident safety and/or property.

The HUD Guidance calls upon housing providers who do consider criminal history to engage in an individualized assessment of each applicant which might include, among other mitigating information, "the facts or circumstances surrounding the criminal conduct; the age of the individual at the time of the

⁴⁸ Lakewood Codified Ordinance 1306.44(a)(2)B., Accessed November 28, 2018: <http://whdrane.conwaygreene.com/NXT/gateway.dll/2110/2111/2130/2175>

⁴⁹ Department of Justice Office of Justice Program, "Bureau of Justice Statistics Factsheet: Profile of Nonviolent Offenders Exiting State Prisons," (October, 2004).

⁵⁰ Jocelyn Fontaine and Jennifer Biess, "Housing as a Platform for Formerly Incarcerated Persons," Washington, D.C.: Urban Institute, April 2012.

⁵¹ U.S. Department of Housing and Urban Development, "Office of General Counsel Guidance on Application of Fair Housing Act Standards to the Use of Criminal Records by Providers of Housing and Real Estate-Related Transactions," released April 2016.

conduct; evidence that the individual has maintained a good tenant history before and/or after the conviction or conduct; and evidence of rehabilitation efforts.” Finally, the HUD Guidance provides that housing providers whose policies include so-called “blanket bans” (i.e. denial of housing to applicants with any criminal conviction) and fail to consider mitigating information will violate the Fair Housing Act.

Additionally, a number of lawsuits and complaints have been brought against tenant screening services under the Fair Credit Reporting Act alleging they provide inaccurate information including expunged, vacated, dismissed, or sealed records, fail to take measures to ensure the accuracy of the information they report (*e.g.*, associating records of people with the same name but different dates of birth), fail to investigate disputes or correct inaccurate information, and fail to notify applicants of the right to review and/or appeal adverse information in their files, among others. A number of such cases have been filed against CoreLogic SafeRent. One example includes a 2014 class action suit filed by the Legal Action Center alleging that CoreLogic SafeRent inaccurately reported criminal backgrounds of consumers and disclosed the race of individuals in their credit profiles. The lawsuit also alleges that CoreLogic SafeRent produces inaccurate reports that include expunged, sealed, and dismissed criminal record cases. The case is pending.⁵²

Because of the racial and ethnic bias in the American criminal justice system, inaccurate information reported through tenant screening services may disparately impact African American and Hispanic/Latino applicants. The use of CoreLogic SafeRent or other tenant screening services for tenant screening including criminal background screening by landlords in the City of Lakewood could disproportionately negatively affect people of color and potentially violate the Fair Housing Act.

B. City of Lakewood Fair Housing Ordinance

Fair housing laws exist at each level of government. The federal Fair Housing Act prohibits housing discrimination on the basis of race, color, religion, national origin, sex, familial status, or disability. Additionally, the State of Ohio prohibits discrimination based on ancestry and military status. The Cuyahoga County ordinance adds the protected bases of sexual orientation, gender identity, and age. The City of Lakewood fair housing ordinance prohibits discrimination based on race, color, creed, religion, national origin, ancestry, disability, marital status, gender, gender identity or expression, sexual orientation, or physical characteristic of the owners or occupants (see Table 43).⁵³

⁵² Legal Action Center, “Litigation: Wilson v. Corelogic SafeRent, LLC,” Accessed November 8, 2018: https://scholar.google.com/scholar_case?case=14662587136813955&hl=en&as_sdt=6&as_vis=1&oi=scholar

⁵³ Codified Ordinances of the City of Lakewood § 516.03 (Ord. 1-16. Passed 6-20-2016).

Table 44: Protected Classes under the Federal Fair Housing Act, Ohio Fair Housing Law, Cuyahoga County Ordinance, and the City of Lakewood Fair Housing Ordinance, 2018

Protected Class	Federal	State	Cuyahoga County	City of Lakewood
Race	X	X	X	X
Color	X	X	X	X
Religion	X	X	X	X
National Origin	X	X	X	X
Sex/Gender	X	X	X	X
Familial Status	X	X	X	
Handicap/Disability	X	X	X	X
Ancestry		X	X	X
Military Status		X	X	
Age			X	X
Creed				X
Marital Status				X
Gender Identity			X	X
Sexual Orientation			X	X
Physical Characteristic				X
Statute/Ordinance	42 U.S.C. § 3601	O.R.C. § 4112.02	§ 206.13 & Title 15 (Ordinance No. 02018-0009)	§ 516.03
Fair Housing Board			Y	Y
Complaint Process	Y	Y	Y	Y

While the mere enactment of a local fair housing ordinance by a city or village does not in itself increase fair housing choice, particularly if the ordinance does not expand upon the protected classes in federal or state law, such ordinances can serve as a signal to local residents that the jurisdiction is concerned about housing discrimination.

In the City of Lakewood’s Chapter 516: Discrimination Prohibited Code, the City of Lakewood established a Human Rights Commission whose responsibility is to “receive, initiate, seek to conciliate, hold hearings on and pass upon complaints alleging violations of this chapter.”⁵⁴ Complaints are to be filed with the Commission by a written sworn complaint. The Commission is to serve on the respondent within 10 days of receiving the complaint, begin investigation of the complaint within 30 days after the filing of the complaint, and make a determination within 30 days regarding reasonable cause to believe a discriminatory practice occurred.⁵⁵

In 2016, the City of Lakewood removed “family status,” i.e. the presence of children under 18, from its civil rights ordinance as a class protected from housing discrimination.⁵⁶ A high percentage of families with

⁵⁴ Codified Ordinances of the City of Lakewood, Ohio § 516.11 (Ord. 1-16. Passed 6-20-2016).

⁵⁵ Codified Ordinances of the City of Lakewood, Ohio § 516.12 (Ord. 1-16. Passed 6-20-2016).

⁵⁶ Codified Ordinances of the City of Lakewood, Ohio § 516.01 (Ord. 1-16. Passed 6-20-2016).

children live in Lakewood, and many interviewees responded that families with children are attracted to Lakewood because of its school system, its parks, and other amenities (see page 11). In Northeast Ohio, family status is the third most reported basis of housing discrimination (20.8% of all complaints filed with HUD over a 25-year period).⁵⁷ In Lakewood, family status is the third most reported incident (see page 48), although families would be protected under federal, state, and county law. The removal of “family status” from the City’s civil rights ordinance is a barrier to housing choice for people living in or trying to move to Lakewood.

C. City of Lakewood Nuisance Abatement Ordinance

Lakewood has a criminal nuisance activity ordinance.⁵⁸ Criminal activity nuisance ordinances (CANOs) are municipal laws that penalize property owners for occurrences of crime and other “nuisance” behaviors on or near their property. These laws often list specific behaviors that are classified as a nuisance and sometimes allow for a vague interpretation of what qualifies as a nuisance. In some municipalities, calling emergency services during a medical crisis can trigger action under a CANO. CANOs often define a timeline wherein if a specified number of “nuisance” activities occur the jurisdiction will compel the property owner to “abate” the nuisance or issue a penalty against the property owner. Abatement often comes in the form of a housing provider evicting a tenant; some city law directors actively encourage the use of eviction as a remedy for a property owner to avoid penalties. Penalties often can come in the form of fines, property owners being billed for the cost of city services, or misdemeanor charges against the property owner.⁵⁹ Threats of eviction or a nuisance citation may also cause a victim to avoid calling the police for assistance, fearing a phone call for help could jeopardize their current and future housing options. For those with mental health problems, the housing instability that can result from eviction may further aggravate their vulnerable situation and lead to homelessness or institutionalization.⁶⁰

Research on CANOs has shown they often disproportionately affect people of color, people with disabilities, and can trigger the eviction of survivors of domestic violence.⁶¹ In several cases, cities have been found to

⁵⁷ Michael Lepley & Lenore Mangiarelli, “The State of Fair Housing in Northeast Ohio” Fair Housing Center for Rights & Research (April, 2018), 37. <http://www.thehousingcenter.org/wp-content/uploads/2018/10/SOFH-2018.-REVISED.pdf>

⁵⁸ Codified Ordinances of the City of Lakewood, Ohio § 510.01 (Ord. 22-18 Passed 7-2-2018).

⁵⁹ Joseph Mead, Megan E. Hatch, J. Rosie Tighe, Marissa Pappas, Kristi Andrasik, and Elizabeth Bonham, “Treating Neighbors as Nuisances: Troubling Applications of Criminal Activity Nuisance Ordinances,” *Cleveland State Law Review Et Cetera*, Vol. 66, Article 3, March 24, 2018.

⁶⁰ Meghan Carter, “How Evictions from Subsidized Housing Routinely Violate the Rights of Persons with Mental Illness,” *Northwestern Journal of Law & Social Policy*, Vol. 5, Issue 1, Article 5, Spring 2010.

⁶¹ Priscilla Ocen, “The New Racially Restrictive Covenant: Race, Welfare, and the Policing of Black Women in Subsidized Housing,” *UCLA law Review* vol. 59 n. 6 (2012), 26.

Matthew Desmond and Nicol Valdez, “Unpolicing the Urban Poor: Consequences of Third-Party Policing for Inner-City Women,” *American Sociological Review* 78, no. 1 117-141 (2012).

Joseph Mead, et. al., “Treating Neighbors as Nuisances: Troubling Applications of Criminal Activity Nuisance Ordinances (2018).”

violate the Fair Housing Act on the basis of sex when CANO enforcement has caused the eviction of or other adverse actions against survivors of domestic violence.⁶²

D. Lakewood Zoning Ordinance: Group Home Minimum Distance Requirement

Some people with disabilities choose to live in group homes. For the purposes of this analysis, “group home” refers to housing occupied by groups of unrelated individuals with disabilities. Zoning codes that treat groups of unrelated people with disabilities differently than groups of related people could violate fair housing law. According to a jointly-written report from the Department of Justice and HUD, “A local government may restrict groups of unrelated persons from living together, if the restrictions are imposed on all such groups.” Because reasonable accommodations are allowed, groups of unrelated people with disabilities must be “given the opportunity to seek an exception or waiver.” Zoning codes that do not provide for such procedures potentially inhibit the rights of people with disabilities.⁶³

The City of Lakewood allows group homes, designated as “adult family homes” and “adult group homes,” as a permitted use in all R and M residential districts (13,616 parcels) and in C3 commercial districts (316 parcels). The City allows group homes in C1, C2, and C4 commercial districts (642 parcels) as a conditional use; group home operators must obtain a conditional use permit to set up a group home in these districts.⁶⁴

The City of Lakewood regulates group homes in residential districts by requiring a minimum distance of 1,000 feet between any two group homes.⁶⁵ Lakewood’s 1,000-foot minimum distance requirement reduces maximum site availability for group home placement in residential districts to approximately 137 parcels, or 1.0% of all R and M parcels (see Figure 20) assuming absolute efficient placement of group homes in residential districts under the minimum distance requirement (group homes sited exactly 1,000 feet apart) and that no other barriers exist.

Anna Kastner, “The Other War at Home: Chronic Nuisance Laws and the Revictimization of Survivors of Domestic Violence,” *California Law Review*, Vol. 103, Issue 4, Article 5 (August 2015).

⁶² *Briggs v. Borough of Norristown, et al.* No. 2:13-cv-02191-ER *ED Pa. filed Apr. 29, 2013.

Nancy Markham v. City of Surprise, et al. 2:15-cv-01696-SRB Filed Sept. 2, 2015.

HOPE Fair Housing Center v. Peoria, Illinois. 1:17-cv-01360 Filed Aug. 10, 2017.

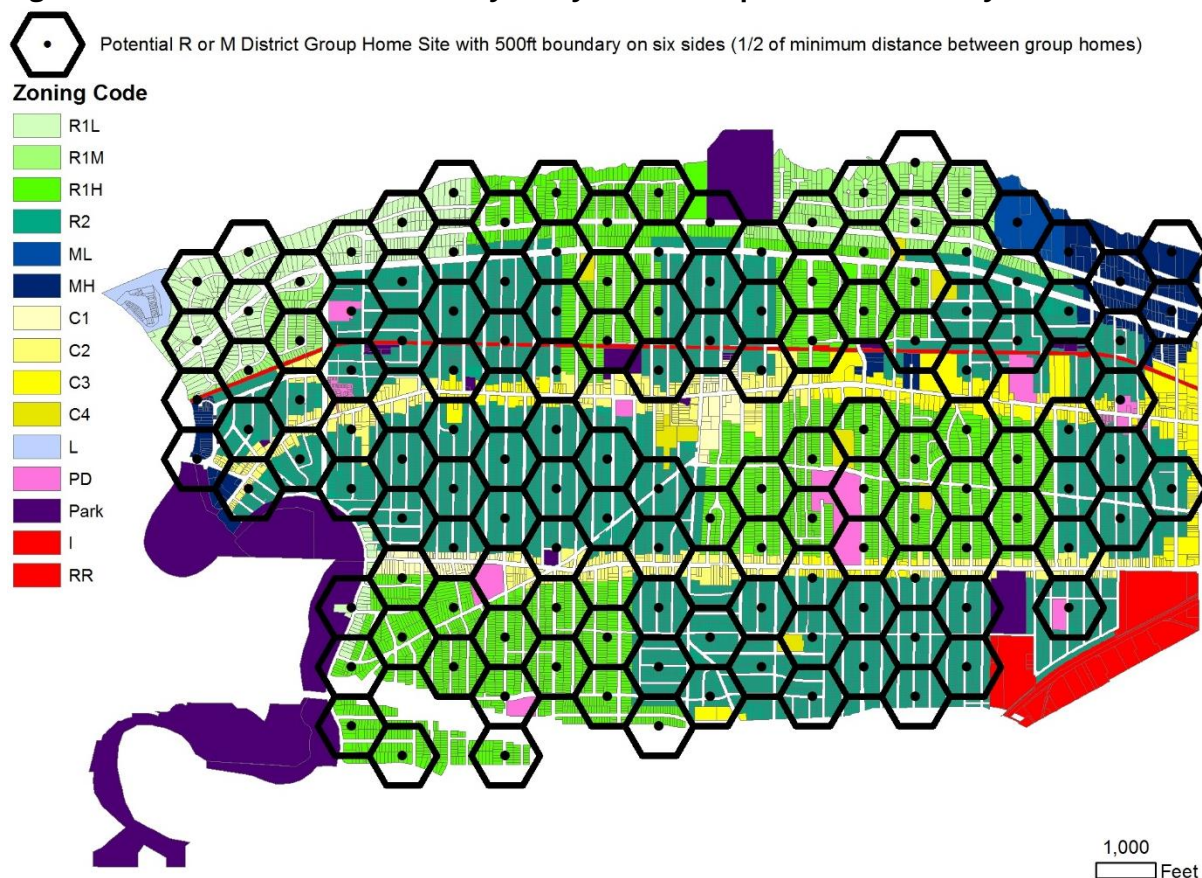
Rosetta Watson v. City of Maplewood, Missouri. 4:17-cv-1269 Filed April 7, 2017.

⁶³ Joint Statement of the Department of Justice and the Department of Housing and Urban Development, “Group Homes, Local Land Use, and the Fair Housing Act,” p. 2 (August 18, 1999).

⁶⁴ Codified Ordinances of the City of Lakewood, Ohio § 1121.02 (Ord. 91-95. Passed 10-7-1996). Codified Ordinances of the City of Lakewood, Ohio § 1123.02 (Ord. 91-95. Passed 10-7-1996). Codified Ordinances of the City of Lakewood, Ohio § 1127.02 (Ord. 91-95. Passed 10-7-1996). Codified Ordinances of the City of Lakewood, Ohio § 1129.02 (Ord. 91-95 Passed 10-7-1996).

⁶⁵ Codified Ordinances of the City of Lakewood, Ohio § 1121.11 (Ord. 91-95. Passed 10-7-1996). Codified Ordinances of the City of Lakewood, Ohio § 1123.11 (Ord. 91-95. Passed 10-7-1996). Codified Ordinances of the City of Lakewood, Ohio § 1127.11 (Ord. 91-95. Passed 10-7-1996).

Figure 20: Residential Site Availability Analysis for Group Homes in the City of Lakewood



(Source: City of Lakewood)

In reality, many barriers exist to group home site-selection making it likely that even fewer than 137 parcels are available for group homes in residential districts. Inefficient site selection; e.g. siting two group homes more than 1,000 feet apart; further reduces the overall availability of compliant sites by extending the boundaries of group home exclusion. Lakewood is nearly built out and has a low vacancy rate, making inefficient site selection probable. Other barriers potentially include lack of suitable structures, rising property values, and community opposition to group homes.

Group homes are a permitted use in all C3 commercial districts (316 parcels; see Figure 21). In the City of Lakewood, C3 commercial districts are mostly clustered along Detroit Avenue and West 117th Street with a smaller grouping along Madison Avenue. For many group home residents and operators, the structures in these areas could be suitable for group home placement. They may not be suitable for group home residents or operators seeking integration into a more residential neighborhood or proximity to Lakewood's many parks, Lake Erie, and other green space.

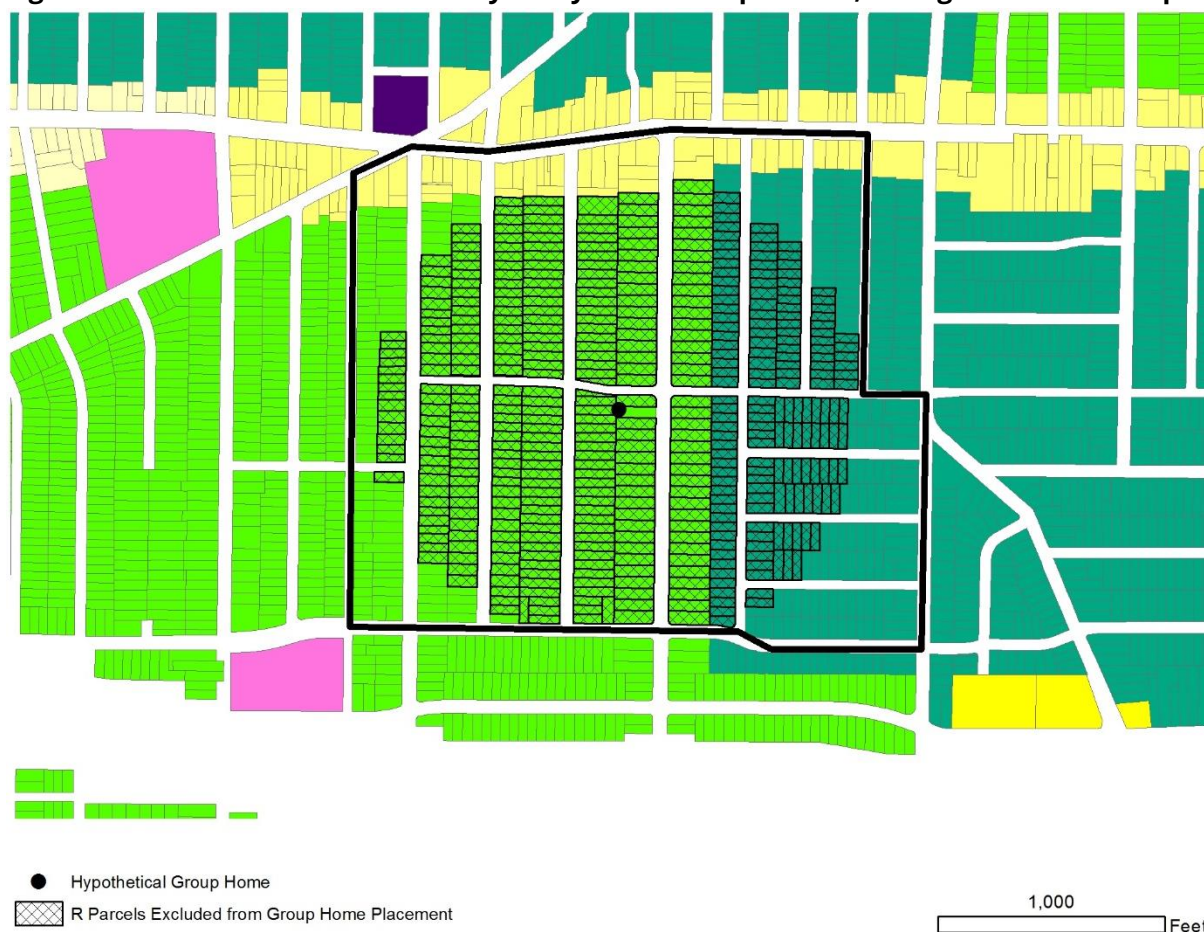
Figure 21: Commercial Districts with Group Homes as a Permitted Use



(Source: City of Lakewood)

A Neighborhood Example: In a typical Lakewood neighborhood (R1H and R2 districts capped by commercial districts; see Figure 22), a 1,000-foot minimum distance around one group home (hypothetical) excludes group homes from two-thirds of the neighboring, residential parcels (450) in a sixteen-block area (675 total residential parcels).

Figure 22: Residential Site Availability Analysis for Group Homes, a Neighborhood Example



(Source: City of Lakewood)

Federal courts have offered contradictory rulings on minimum distance requirements for group homes making it difficult to turn to case law for guidance on the issue, but in most cases minimum distance requirements have been found to violate the Fair Housing Act and the Fair Housing Amendments Act (FHAA). State and local governments often enact minimum distance requirements citing the goals of integration (or preventing “clustering”) and deinstitutionalization for residents with disabilities, but some courts have found that discrimination through minimum distance requirements is not an acceptable means to integration or that is contrary to the goal itself. Density thresholds for group home concentration have not been established and, in many cases, would stand in conflict to several federal court decisions. The anti-clustering justification has been rejected repeatedly in federal courts. In *Larkin v. the State of Michigan Department of Social Services*, the Sixth Circuit Court of Appeals found that the State of Michigan’s 1,500-foot minimum distance requirement for licensing of residential facilities violated the FHAA.⁶⁶ The State argued that it wished to prevent clustering of group homes, or “ghettoization,” and to achieve the goal of deinstitutionalization for residents. The court found no evidence that clustering would occur in the absence

⁶⁶ Additional cases where courts rejected the clustering argument include: *Advocacy Center for Persons with Disabilities v. Woodlands Estates*, *ARC of New Jersey v. New Jersey*, *Children’s Alliance v. City of Bellevue*, *Horizon House Developmental Services, Inc. v. Township of Upper Southampton*, and *Nevada Fair Housing Inc. v. Clark County*.

of restrictions, and if it did it would be under the free choice of the person with disability to live near other individuals with disabilities. The ruling described the minimum distance requirement as “paternalistic” and a policy of “forced integration.” The ruling also stated, “Two . . . facilities 500 feet apart would violate the statute without remotely threatening to recreate an institutional setting in the community.”⁶⁷

Some courts have ruled that separation of people with disabilities to achieve integration is not a legitimate government interest. In *ARC of New Jersey v. New Jersey* (1996) and *Horizon House Developmental Services, Inc. v. Township of Upper Southampton* (1992), federal courts stated that integration of group home residents was not adequate justification for discriminatory, minimum distance requirements under the FHAA. The *Horizon House* decision noted the following testimony: “‘Meaningful integration’ is a deep and complex notion; it involves a variety of circumstances, not the least of which is the relationship between individuals and their community. The first step, however, is to be ‘physically included’ and to have choices about where to live.”⁶⁸

In some cases, courts found that a municipality’s refusal to grant a reasonable accommodation by waiving a minimum distance requirement violated the FHAA. In *Oconomowoc Residential Programs Incorporated v. City of Milwaukee* (2002), the Seventh Circuit Court declined to decide if the City’s minimum distance requirement itself violated the FHAA.⁶⁹ The Court did decide that the City failed to provide a reasonable accommodation, when requested, to residents with disabilities choosing to live in group homes, thus violating their right to enjoy an equal opportunity to housing by enforcing its minimum distance requirement under FHAA.⁷⁰ Confusing the matter somewhat, the Court of the Western District of Washington, in *Children’s Alliance v. City of Bellevue* (1997), found that even the offer of reasonable accommodation does not validate a minimum distance requirement under the Fair Housing Act.⁷¹

In fewer cases, minimum distance requirements have been upheld under the Fair Housing Act by federal courts. In *Familystyle of St. Paul Inc. v. City of St. Paul* (1991), the Eighth Circuit Court found that the State of Minnesota’s dispersal requirement for group homes was not intended to discriminate against the disabled and that deinstitutionalization of the disabled was a legitimate goal of the City and State.⁷² In *Harding v. City of Toledo* (2007), the Court for the Northern District of Ohio upheld the City’s 500-foot minimum distance requirement noting that Toledo’s minimum distance was substantially smaller than that of the

⁶⁷ Larkin v. State of Michigan Department of Social Services, 89 F.3d 285 (6th Cir. 1996).

⁶⁸ ARC of New Jersey, Inc. v. New Jersey, 950 F. Supp. 637 (D. New Jersey 1996).
Horizon House v. Township of Upper Southampton, 804 F. Supp. 683 (E.D. Pennsylvania 1992).
Daniel R. Mandelker, “Housing Quotas for People with Disabilities: Legislating Exclusion,” *The Urban Lawyer* vol. 43 no. 4 (2011), 936-939.

⁶⁹ Additional cases cities violated the FHAA by failing to make a reasonable accommodation by waiving minimum distance requirements include: *New Hope Fellowship v. City of Omaha* and *United States v. the City of Chicago Heights*.

⁷⁰ *Oconomowoc Residential Programs Incorporated v. City of Milwaukee*, 300 F.3d 775 (7th Cir. 2002).
Mandelker, “Housing Quotas for People with Disabilities: Legislating Exclusion,” 939.

⁷¹ *Children’s Alliance v. City of Bellevue*, 950 F. Supp. 1491 (W.D. Washington 1997).

⁷² *Familystyle of St. Paul Inc. v. City of St. Paul*, 923 F.2d 91 (8th Cir. 1991).

Larkin case.⁷³ In two cases minimum distances requirements were upheld because cities offered reasonable accommodations on a case-by-case basis or offered special permits waving the distance requirement.⁷⁴

⁷³ *Moretha Harding, et al. v. City of Toledo*, 433 F. Supp. 2d 867 (N.D. Ohio 2007).

⁷⁴ *Elderhaven Inc. v. City of Lubbock*, 98 F.3d 175 (5th Cir. 1996).
Mandelker, "Housing Quotas for People with Disabilities: Legislating Exclusion," 939-940.

XI. IMPEDIMENTS TO FAIR HOUSING CHOICE AND RECOMMENDATIONS

1. **Impediment: Low income residents of Lakewood are displaced by eviction and rising housing costs**

Home sale prices and rents have steadily risen in Lakewood and housing insecurity has increased as a result. In 2016, 39.1% of renters, 25.6% of owners with a mortgage, and 16.3% of owners without a mortgage were considered housing cost-burdened. In Lakewood, African Americans, families with children, and people with disabilities disproportionately face housing insecurity. In 2010 (last available year for data breakdown), more than 50% of African Americans living in Lakewood experienced “housing problems” as defined by the Census Bureau, meaning most African American households in Lakewood are housing cost-burdened and live in a unit with a deficiency. People of color, families with children, and people with disabilities living in the City of Lakewood disproportionately access Homelessness Prevention Services available to residents through Lakewood Community Services Center, showing that they disproportionately face housing insecurity and homelessness. Whereas units with rents under \$500 per month totaled 5,680 in 2000, they decreased by 55% by 2010 and another 40% by 2016 leaving only 1,556 such units in the City. Households are considered housing cost-burdened when they pay more than 30% of their income toward housing costs. Eighty-six point seven percent of those who relied on emergency assistance from Lakewood Community Services Center’s Homelessness Prevention Service reported an annual income of less than \$18,000. For an individual with an income of \$18,000 to not be housing cost-burdened, their rent may not exceed \$450. Because such affordable units are more and more scarce within the City, many residents are forced to move out of Lakewood.

In 2017 in Lakewood, 545 households faced eviction. Since people of color, families with children, and people with disabilities are likely to use emergency housing services, they are more likely to face eviction. In Lakewood in 2017, defendants in eviction cases were represented by a lawyer in only 2.4% of cases.

Recommendations:

- *Consider requiring inclusion of affordable units in new multi-family construction.*
- *Continue to use CDBG and HOME dollars to build new affordable housing as funds allow.*
- *Consider implementing a “Right to Counsel” for eviction proceedings, i.e. publically provided representation in cases of evictions for households that cannot afford an attorney.⁷⁵*
- *Continue providing emergency housing services through Lakewood Community Services Center.*
- *Re-implement a rental rights clinic for residents of Lakewood.*

⁷⁵ Evictions have been shown to increase family poverty, have been linked to increased risk of suicide and decreased childhood development, and cause job loss. In New York City, increased access to legal assistance in civil cases was associated with a 24% decrease in evictions. Teresa Wiltz, “How Free Legal Help Can Prevent Evictions,” Pew Charitable Trusts (October, 2017) <https://www.pewtrusts.org/en/research-and-analysis/blogs/stateline/2017/10/27/how-free-legal-help-can-prevent-evictions>

2. Impediment: Lakewood Has Limited Accessible Housing Options for People with Disabilities

The housing stock in Lakewood is old (98.7% of all housing was built before 1990) and most homes were unlikely to be built to be accessible for people with physical disabilities. Additionally, 93.2% of all housing with 5 or more units was built prior to 1980, before requirements under the Fair Housing Amendments Act that multi-family housing with 4 or more units be built with accessibility features. Further, much of the federally-assisted multifamily housing in Lakewood that is accessible to persons with physical disabilities is restricted to occupancy by seniors. Regional demand for accessible housing far exceeds the availability of accessible units.

Recommendations:

- *Continue providing home improvement loans and rental restoration loans for owners and landlords with tenants with disabilities.*
- *Continue to ensure that all new construction of covered multifamily housing is built in accordance with the Fair Housing Act Accessibility Guidelines.*
- *Require that new single family construction is built with accessibility features.*

3. Impediment: The City of Lakewood's Fair Housing Ordinance does not Protect Housing Voucher Program Participants

Fair Housing Center research has shown that renters using Housing Choice Vouchers are denied housing by landlords in Cuyahoga County 9 out of 10 times. The households using vouchers in Lakewood have decreased significantly (24.2%) since the time of Lakewood's last AI. Lakewood is home to 1.9% of housing voucher participants in the County. In the City's 2011 AI, landlords advertised that they did not accept voucher in 1 out of 10 rental ads. The same was found for this AI. To address such discrimination, the City of Lakewood made it a goal in 2011 to penalize landlords who discriminated against housing voucher program participants, but later determined it did not have the legal authority to do so.

Participants in the Housing Choice Voucher Program (HCVP) in Cuyahoga County are 89% African American. Discrimination against HCVP participants contributes to racial segregation in Cuyahoga County, and it has been shown that landlords who refuse to accept housing vouchers are more likely to discriminate against black renters in general. Further, the denial of housing vouchers in Lakewood exacerbates Lakewood's issue of overall decreasing affordability as another mechanism of excluding low-income households.

Recommendation:

- *Consider amending the City's fair housing ordinance to prohibit discrimination against persons using housing choice vouchers by expanding Lakewood's fair housing ordinance to include "source of income." Ensure that "source of income" is defined as including all lawful sources of income AND rental assistance from any federal, state, or locally administered benefit or subsidy program.*

4. Impediment: Racial Disparities in Mortgage Lending

There are continued disparities in mortgage lending in Lakewood. Asian, African American, and Hispanic/Latino borrowers in Lakewood are more likely to be denied mortgages than white borrowers.

Recommendations:

- *Monitor lending practices in the City of Lakewood to ensure compliance with fair housing and fair lending laws.*
- *Conduct fair lending testing and investigate complaints of discriminatory lending practices.*

5. Impediment: The Use of Tenant Screening Service to Screen for Criminal Background

The City of Lakewood encourages landlords to use a tenant screening and criminal background check service, CoreLogic SafeRent, by offering the service at a discounted rate and allowing the use of this service to fulfill a requirement in obtaining a housing license. CoreLogic SafeRent has been accused of providing housing providers with inaccurate criminal background reports. HUD has stated that criminal background screening can be discriminatory on the basis of race when housing providers use blanket bans of people with criminal history.

Recommendations:

- *Ensure that landlords who are using criminal background checks are doing so uniformly for all applicants.*
- *Prohibit landlords from using blanket bans of applicants with a criminal history, and encourage landlords to consider applicants with criminal history on an individual basis.*
- *Eliminate the City's arrangement with or endorsement of any specific tenant screening service provider.*

6. Impediment: The City of Lakewood's Fair Housing Ordinance does not Protect Families with Children

Families are attracted to the City of Lakewood because of its good schools and family-friendly amenities, but the City of Lakewood accidentally removed "family status" as well as "age" as a classes protected from housing discrimination from its fair housing ordinance. Family status, i.e., the presence of children under 18, is one of the most reported bases for housing discrimination in the City of Lakewood and is protected under federal, state, and county fair housing law.

Recommendations:

- *Amend the City's fair housing ordinance to prohibit discrimination against families with children by expanding Lakewood's fair housing ordinance to include "family status" as a protected class.*

7. Impediment: Group Home Minimum Distance Requirement Limits Housing Opportunities for People with Disabilities

The City of Lakewood's minimum distance requirement for group homes in residential districts has an adverse effect on fair housing choice for people with disabilities by restricting locations for group homes. DOJ and HUD have found such requirements to be inconsistent with the Fair Housing Amendments Act. Similar laws have been found to violate the Fair Housing Act and Americans with Disabilities Act. In most cases, federal courts have rejected minimum distance requirements under Fair Housing Amendments Act. Some courts went so far to say that integration of people with disabilities is not a justification for minimum distance requirements nor is integration achievable by this means. In a few cases, federal courts have found the opposite: that minimum distance requirements are a legal means for achieving integration, but because minimum distance requirements have failed more often than not, it is likely that Lakewood's minimum distance requirement for group homes would be difficult to defend in federal court.

Recommendation:

- *Consider removing group home minimum distance requirement from zoning code.*

OPPORTUNITIES FOR AFFIRMATIVELY FURTHERING FAIR HOUSING

1. Criminal Activity Nuisance Ordinance

The City of Lakewood has a criminal activity nuisance ordinance (CANO) that penalizes property owners when emergency services are requested at their property. In cities across the United States, CANO's have been shown to disproportionately affect people of color, people with disabilities, and survivors of domestic violence. The City of Lakewood has already removed "domestic violence" and "menacing by stalking" as nuisance activities as a way to protect survivors of domestic violence.

Recommendation:

- *Monitor enforcement of CANO implementation to ensure law is uniformly enforced and not disproportionality affecting protected groups.*

Fair Housing Center for Rights & Research is a not-for-profit agency whose mission is to protect and expand fair housing rights, eliminate housing discrimination, and promote integrated communities.

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